

SIGN-IN SHEET

Borden Inc., Columbus Coated Fabrics Settlement Conference

June 4, 1991

NAME/AFFILIATION

PHONE NUMBER

Jane Neumann

312/886-2871

Jeffrey A. Cahn

312 886-6670

Uylaine E. McMahon, USEPA

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Ann Budich

(312) 353-6844

Jim Warchall
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312-853-7692

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Sidley Austin 312 853 2224

Martin Wasmeier

JAMES F. WARCHALL

SIDLEY & AUSTIN

ONE FIRST NATIONAL PLAZA
CHICAGO, ILLINOIS 60603

312: 853-7692
TELEX: 25-4364

AGENDA

1. Introductions and sign-in
2. Review goals, agenda, off-the-record
-settlement, common understanding
3. Procedural review
-Jeff or Ann
4. Respondent presents new information by violation.
Any compliance since Order filed?
5. Settlement offer, if any.
6. Clarify points of disagreement.
What is the permit?
7. BREAK
8. Re-iterate EPA's view - negotiate.
9. Establish timetable for CAFO or next contact.
10. Copy sign-in sheet and distribute.

THEME: RCRA program is intended to establish and maintain close communication between hazardous waste handlers and regulatory agencies.

Jeff reviewed procedures

1. Sampling + analysis

Showed us page from a log book of samples taken

Also record of Stilson lab report.

We've done a reasonably good job.

We're not perfect.

Do keep some kind of sampling log

Have revised sampling log + asked Stilson to modify form of report.

2) Everyone was trained @ least once a year.
Most trained twice a year, over half

They didn't provide copies

Each ^{process} area of the plant keeps separate record sheet of training for each indiv. employee. Can provide these records if we want them later. They are voluminous. Didn't bring any.

- 3) Provided copies of 1989 Contingency Plan which is simply their Part B submission. Also ^{revised} 1985 Cont. Plan which has Harkness' name & makes reference to ~~of~~ revisions of permit as required by USEPA & DEPA. Also 1983 folder of cont. plan which contains pages marked as revisions in 1985 & 1986. I rejected the entire document.

I asked for letters of modification. She asked if the regs require such.

They offered to look into it further to see how this was communicated to USEPA.

- 4) Solvent still is not regulated under RCRA. Part A of permit specifically exempts the permit.

Submitted revised closure plan ^{dated 3-6-90} but no documentation of notification of modification.

Reiterated it is not regulated, notwithstanding what the permit says.

An offer \$1,000 - no changes to compliance requirements

They have fixed sampling + training + have revised contingency + closure plans.

We countered \$2,100

Differences

Sampling - no substantially in compliance

Training - no

E.C. -

Solvent still.

Records to ask for copies of if they don't settle
Solvent still closure folder

Sampling records.

E.C. - further documentation

\$2100 agreed

CAFO in 30 days.

M E M O R A N D U M

TO: File

FROM: Jeffrey A. Cahn

DATE: May 7, 1991

RE: Notes regarding the answer of Borden Columbus Coated Fabrics.

1. Regarding ¶ 10.A, substantial compliance is not the same as complete compliance. Because we recognize that there is some compliance we have calculated a small penalty amount.

2. Regarding ¶ 10B, all of the employees responsible for operation of facility generating hazardous waste should have been trained, not just some. Second, there is no indication at all regarding training of those who operate the storage facility. Finally, although they are in compliance with requirements of regulations of training once per year, the permit requires training twice per year.

3. N.L. Orr, et al., are listed in the original permit. Note that what Borden seems to be relying on is their part B application to the state, arguing that this somehow is equivalent to a modification of their U.S. EPA permit. So sorry. They admit that none of these people listed in the permit work at Borden any longer. We have no record of notification. Note that the people listed on page 5 of their answer are the individuals listed in their state part B application. They did send us a copy of their state part B application. Borden may argue that the part B application constitutes the type of notification due to U.S. EPA under the Regs. See 270.42 for notifications - must notify director by certified mail or other way of proof, within seven days after fact. Must detail changes and state why. Must send copies to all on mailing list.

4. ¶10D may be a problem for us, because the solvent still may in fact not be part of their permitted facility. The solvent still is probably used to generate waste/or a product, and is not a storage facility. Note that the definition of facility, 260.10, only covers storage facilities and does not include generating facilities. We will see what type of evidence Borden comes up with.

- I need to review what constitutes "notice".

- We should treat our complaint/the solvent still paragraph as one unit and focus our settlement discussions on resolving the whole matter. This assumes that the defendants do not have our penalty calculation breakout, and do not know that any infirmities that they prove up with respect to the claims going to the solvent still will result in a \$6,000 reduction in a \$7,500 complaint. In other words, its a package deal. Note that we can push on Borden's errors with respect to the state part B, and make them feel less sure with respect to any arguments they advance regarding the still.

- we need an agenda, even though the defendants requested this conference.

1. Introductions/sign-in
2. U.S. EPA's claims
3. Penalty

- we can hold the meeting here, although I have no real objections to going to Sidley.

- We need to decide if we are going to have the state inspector present at this settlement conference. Maybe we can conference him in.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:
BORDEN INC., COLUMBUS COATED FABRICS)
1280 NORTH GRANT AVENUE)
COLUMBUS, OHIO)

EPA I.D. NO: OHD 004 294 351)
_____)

Docket No. V-W-91 R-4

NOTICE OF FILING

RECEIVED

APR 16 1991

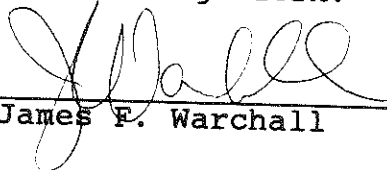
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

TO: Ms. Beverly Shorty
Regional Hearing Clerk (SMF-14)
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
230 S. Dearborn Street
Chicago, Illinois 60604

Mr. Nicholas R. Bollo
Office of Regional Counsel (5CB-TUB-3)
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
230 S. Dearborn Street
Chicago, Illinois 60604

Ms. Jane Neumann
Waste Management Division
Enforcement Program Section (5HN-12)
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
230 S. Dearborn Street
Chicago, Illinois 60604

Please take notice that on April 15, 1991, Borden filed the attached ANSWER AND AFFIRMATIVE DEFENSES TO COMPLAINT, FINDINGS OF VIOLATION AND COMPLIANCE ORDER, AND REQUEST FOR HEARING with the Region 5, Regional Hearing Clerk.



James F. Warchall

James F. Warchall
David J. Engel
SIDLEY & AUSTIN
One First National Plaza
Chicago, Illinois 60603
(312)853-7000

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:)	Docket No. V-W-91 R-4
BORDEN INC., COLUMBUS COATED FABRICS)	ANSWER AND AFFIRMATIVE
1280 NORTH GRANT AVENUE)	DEFENSES TO COMPLAINT,
COLUMBUS, OHIO)	FINDINGS OF VIOLATION
)	AND COMPLIANCE ORDER,
EPA I.D. NO: OHD 004 294 351)	AND REQUEST FOR
)	HEARING

ANSWER

Borden, Inc., Columbus Coated Fabrics, ("Borden") by its attorneys, Sidley & Austin, states as follows in response to the Complaint, Findings of Violation and Compliance Order ("Complaint") herein:

Preamble

Borden admits the allegations of the first paragraph of the section of the Complaint entitled "Preamble." Borden lacks information sufficient to form a belief regarding the truth or falsity of the allegations of the second paragraph of the Preamble.

Borden admits the allegations set forth in the section of the Complaint entitled "Jurisdiction."

Findings of Violation

1. Borden admits the allegations of paragraph 1 of the Section of the Complaint entitled "Findings of Violation," except that Borden is a New Jersey corporation, not an Ohio corporation.

2. Borden admits the allegations of paragraph 2 of the Findings of Violation.

3. Borden admits the allegations of paragraph 3 of the Findings of Violation, except that Borden states that certain hazardous waste regulations were published prior to May 19, 1980.

4. Borden admits the allegations of paragraph 4 of the Findings of Violation.

5. Borden admits the allegations of paragraph 5 of the Findings of Violation.

6. Borden admits the allegations of paragraph 6 of the Findings of Violation.

7. Borden admits the allegations of paragraph 7 of the Findings of Violation.

8. Borden admits the allegations of paragraph 8 of the Findings of Violation.

9. Borden admits the allegations of paragraph 9 of the Findings of Violation, with the exception that the facility does not currently generate or store still bottoms from the recovery of spent non-halogenated solvents.

10A. Borden admits the allegations of paragraph 10A which merely set forth certain of the provisions of Borden's permit. Borden denies the allegations of paragraph 10A to the effect that Borden violated the conditions of its permit and 40 C.F.R. § 270.30(a) with respect to maintaining records of sampling and analysis for EPA waste codes F003, F005, and F006. Borden affirmatively states that its sample logs substantially comply with the requirements set forth in its waste analysis plan. Borden further affirmatively states that its sample logs, together with the analytical reports provided by Stilson Laboratories, Inc., substantially comply with the requirements of its permit applicable to records of sampling information.

10B. Borden admits the allegations of paragraph 10B which merely set forth certain of the provisions of Borden's permit. Borden denies the allegations of paragraph 10B to the effect that Borden violated such conditions or 40 C.F.R. § 270.30(a). Borden

affirmatively states that certain of its employees responsible for operation and inspection of facilities generating hazardous waste met twice each year for review and update of Borden's training program and that other facility employees received training on at least an annual basis in accordance with 40 C.F.R. § 264.16(c). Borden further affirmatively states that its training program and maintenance of training records have complied with the requirements of 40 C.F.R. § 264.16, including the requirement of 40 C.F.R. § 264.16(c) that training be reviewed annually.

10C. Borden denies that Borden's RCRA permit states that N.L. Orr is the designated Emergency Coordinator for the facility. Borden further denies that Borden's RCRA permit states that S.E. Lizer, M.E. Hanse, L.T. Poteet, S.W. Morris, and D. H. Bibb are designated as Alternate Emergency Coordinators. Borden admits that on September 7, 1990, N.L. Orr was no longer employed by Borden and that another Emergency Coordinator had been designated. Borden further admits that none of the five Alternate Emergency Coordinators listed above had such responsibilities on September 7, 1990. Borden admits that a change in designation of emergency coordinators constitutes a Class 1 permit modification and that such modifications require notification of EPA or the state director within seven days after the change is made. Borden denies that such notification must be

provided by certified mail, and states that such notification may be made by any means "that establish proof of delivery." Borden denies that no such notifications were made to EPA or the state director and denies that it violated its permit or 40 C.F.R.

270.42. Borden affirmatively states that it has on several occasions submitted Class 1 notifications to EPA and/or the state director of changes in designations of emergency coordinators, and that as of September 7, 1990, the plant's permit stated that the plant's Primary Emergency Coordinator was Cornell Harkness and that the Alternate Emergency Coordinators were Wayne Judy, Joe Ochwat, George Rusincovitch, Dewey Bibb, Jim Weaver, Bill Ilg, and Ken Green. Borden further affirmatively states that the facility's permit had been properly modified to reflect such designations by notification to EPA or the state director in compliance with 40 C.F.R. § 270.42.

10D. Borden admits the allegations of paragraph 10D which merely set forth certain of the provisions of Borden's permit. Borden admits that it did not notify EPA of the removal of a solvent still from the facility. Borden denies that not notifying EPA of the removal of the solvent still violated either the conditions of its permit or 40 C.F.R. § 270.30(a). Borden affirmatively states that the solvent still was not included within the "permitted facility" and, therefore, that Borden had no obligation to notify EPA of the removal of the solvent still from the plant premises.

AFFIRMATIVE DEFENSES

Ohio Part B

1. Because the Ohio EPA inspector insisted on reviewing Borden's original RCRA permit application, rather than the current permit which has been the subject of several modifications, the violations alleged in the Complaint are based on erroneous and out-of-date information.

Ask for evidence.

2. Ohio EPA had actual notice of the removal of the solvent still as early 1987 or 1988, making any notification obligation superfluous.

WHEREFORE, Borden requests that the Complaint be dismissed.

REQUEST FOR HEARING

Borden hereby requests a hearing on the issues raised by the Complaint and Answer.

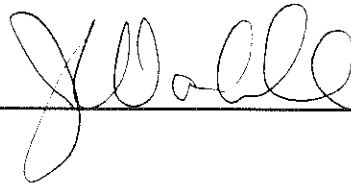
Respectfully submitted,
BORDEN, INC. COLUMBUS COATED FABRICS

By: 
One of its attorneys

James F. Warchall
David J. Engel
SIDLEY & AUSTIN
One First National Plaza
Chicago, Illinois 60603
(312)853-7692

CERTIFICATE OF SERVICE

James F. Warchall, an attorney, hereby certifies that on April 15, 1991, he caused a copy of the foregoing Notice of Filing, and the document referred to therein, to be personally served upon the persons to whom the Notice of Filing is directed.



P 371 346 102
RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Prentice Hall, Agent for Borden/Columbus C. Fabrics	
Street and No. 380 S. 5th St.	
City, State and ZIP Code Columbus, OH 43201	
Postage	\$ 1.44
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	1.00
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 3.44
Postmark or Date	

PS Form 3800, Feb. 1982

US EPA 5HR-12 REB NEUMAN

P 371 346 163
RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to W. B. BARTON, Dir. Borden, Inc	
Street and No. 1280 N. Grant Ave.	
P.O., State and ZIP Code Columbus, OH 43201	
Postage	\$.98
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	1.00
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 2.98
Postmark or Date	

PS Form 3800, Feb. 1982

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:
Prentice Hall Corp.
Reg. Agent for
Borden/Columbus Coated Fabrics
380 S. 5th St.
Columbus, OH

4. Article Number
371 346 102

Type of Service:
☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X *[Signature]*

7. Date of Delivery
MAR 15 1991

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Apr. 1989

*U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

P 371 346 102
RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Prentice Hall, Agent for Borden/Columbus C. Fabrics	
Street and No. 380 S. 5th St.	
City, State and ZIP Code Columbus, OH 43201	
Postage	\$ 1.44
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	1.00
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 3.44
Postmark or Date	

PS Form 3800, Feb. 1982

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:
W. B. BARTON, DIR
Environmental Affairs
Borden, Inc
1280 N. Grant Ave
Columbus, OH

4. Article Number
371 346 163

Type of Service:
☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X *[Signature]*

6. Signature — Agent
X *[Signature]*

7. Date of Delivery
3/15

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Apr. 1989

*U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

5+R-12

Neuman



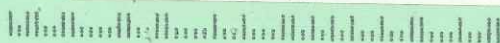
PENALTY FOR PRIVATE
USE, \$300

RETURN
TO



Print Sender's name, address, and ZIP Code in the space below.

ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN STREET
CHICAGO IL 60604



UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

5+R-12

Neuman



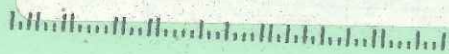
PENALTY FOR PRIVATE
USE, \$300

RETURN
TO



Print Sender's name, address, and ZIP Code in the space below.

ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN STREET
CHICAGO IL 60604



MAR 12 1991

371,346,102

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Prentice-Hall Corporate System
Registered Agent for
Borden, Inc., Columbus Coated Fabrics
380 South Fifth Street
Columbus, Ohio 43215

Re: Complaint, Findings of Violation
and Compliance Order
Borden, Inc., Columbus Coated Fabrics
OHD 004 294 351

Dear Sir or Madam:

Enclosed please find a Complaint and Compliance Order which specifies this Agency's determination of certain violations by Borden, Inc., Columbus Coated Fabrics of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6901 et seq. This Agency's determination is based on an inspection of the facility located at 1280 North Grant Avenue, Columbus, Ohio, by the Ohio Environmental Protection Agency (OEPA), and other information in our files. The Findings in the Complaint state the reasons for such a determination. In essence, the facility failed to meet particular requirements of RCRA relating to records of sampling and analysis, personnel training, notification of change in emergency coordinators and notification of physical alteration of the facility.

Accompanying the Complaint is a Notice of Opportunity for Hearing. Should you desire to contest the Complaint, a written request for a hearing is required to be filed with Ms. Beverly Shorty, Regional Hearing Clerk (5MF-14), United States Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, within 30 days from receipt of this Complaint. A copy of your request should be sent to Nicholas R. Bollo, Office of Regional Counsel (5CS-TUB-3) at the above address.

Regardless of whether you choose to request a hearing within the prescribed time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions or desire to request an informal conference for the purpose of settlement with Waste Management Division staff, please contact Jane Neumann, United States Environmental Protection Agency, IN/MN/OH Enforcement Program Section (5HR-12), 230 South Dearborn Street, Chicago, Illinois 60604. Her phone number is (312) 886-2871.

Sincerely yours,

William E. Muno
Associate Division Director
Office of RCRA

Enclosure ✓

cc: Michael Savage, OEPA - w/enc1. ✓
W. Bailey Barton, Borden, Inc. - w/enc1. ✓

#371 346-163

bcc: Robert Small, OS-520 - w/enc1. ✓
Jean Sharp, 5HR-13 - w/enc1. ✓
Beverly Shorty, 5MF-14 - w/enc1. ✓
Steve Bouchard, Ohio Permit Section, 5HR-13 - w/enc1. ✓
Nicholas Bollo, Regional Counsel, 5CS-TUB-3 - w/enc1. ✓

5HR-JCK-\jane\phyllis\6-8093\jane\complrdr.ccf\February 13, 1991 final.form

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)											
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR	ORC	
Pr 2/13/91	JN 2/13/91					9/2 2/13/91	9/2 2/26/91	SICS 3-7-91 for WEM			

Regardless of whether you choose to request a hearing within the prescribed time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions or desire to request an informal conference for the purpose of settlement with Waste Management Division staff, please contact Jane Neumann, United States Environmental Protection Agency, IN/MN/OH Enforcement Program Section (5HR-12), 230 South Dearborn Street, Chicago, Illinois 60604. Her phone number is (312) 886-2871.

Sincerely yours,



William E. Muno
Associate Division Director *for*
Office of RCRA

Enclosure

cc: Michael Savage, OEPA - w/encl.
W. Bailey Barton, Borden, Inc. - w/encl.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:
BORDEN INC., COLUMBUS COATED FABRICS
1280 NORTH GRANT AVENUE
COLUMBUS, OHIO

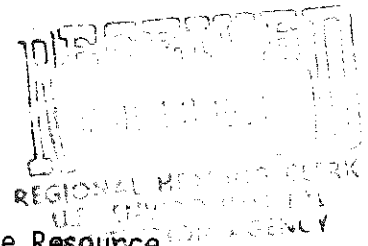
EPA I.D. NO: OHD 004 294 351

DOCKET NO.

V-W- 91 R- 4

COMPLAINT, FINDINGS OF
VIOLATION AND COMPLIANCE ORDER

PREAMBLE



This Complaint is filed pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. §6928(a)(1) and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Associate Division Director, Office of RCRA, Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is Borden, Inc., Columbus Coated Fabrics (CCF).

The Complaint is based on information obtained by the U.S. EPA, including a compliance inspection of the CCF facility at 1280 N. Grant Avenue, Columbus, Ohio, conducted by the Ohio Environmental Protection Agency (OEPA), on September 7, 1990. At the time of the inspection, violations of certain applicable Federal regulations were identified. Pursuant to 42 U.S.C. §6928(a)(1), and based on the information cited above, it has been determined that the Respondent has also violated certain provisions of the Final Permit issued to CCF on September 27, 1984, by the U.S. EPA.

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1) and 3008 of RCRA, 42 U.S.C. §6912(a)(1), and §6928, respectively.

FINDINGS OF VIOLATION

This determination of violation is based on the following:

1. Respondent, Borden, Inc., Columbus Coated Fabrics, is a person defined by Section 1004(15) of RCRA, 42 U.S.C. §6903(15) who owns and operates a facility at 1280 North Grant Avenue, Columbus, Ohio, that generates and stores hazardous waste. Respondent is an Ohio Corporation whose registered agent is Prentice-Hall Corporate System, 380 South Fifth Street, Columbus, Ohio 43215.
2. Section 3010(a) of RCRA, 42 U.S.C. §6930(a), requires any person who generates or transports hazardous waste, or owns or operates a facility for the treatment, storage, or disposal of hazardous waste, to notify U.S. EPA of such activity within 90 days of the promulgation of regulations under Section 3001 of RCRA, 42 U.S.C. §6921. Section 3010(a) of RCRA, 42 U.S.C. §6930, also provides that no hazardous waste subject to regulations may be transported, treated, stored, or disposed of unless the required notification has been given.
3. U.S. EPA first published regulations concerning the generation, transportation, treatment, storage or disposal of hazardous waste on May 19, 1980. These regulations are codified at 40 CFR Parts 260 et seq.

Notification to U.S. EPA of hazardous waste activity was required in most instances no later than August 18, 1980.

4. Section 3005(a) of RCRA requires U.S. EPA to publish regulations requiring each person owning or operating a hazardous waste treatment, storage, or disposal facility to obtain a RCRA permit. Such regulations were published on May 19, 1980, and are codified at 40 CFR Parts 270 and 271 (formerly Parts 122 and 123). The regulations require that persons who treat, store, or dispose of hazardous waste submit Part A of the permit application in most instances no later than November 19, 1980. These regulations authorize the Regional Administrator to require submission of Part B of the permit application.
5. Section 3005(c) of RCRA provides for issuance by the Administrator of the U.S. EPA of a permit for treatment, storage or disposal of hazardous waste.
6. On August 18, 1980, Respondent, as Columbus Coated Fabrics, filed a notification of hazardous waste activity for this facility with U.S. EPA pursuant to Section 3010 of RCRA. On March 26, 1982, Respondent notified the U.S. EPA of a change in its name to Borden, Inc., Columbus Coated Fabrics.
7. On November 19, 1980, Respondent filed Part A of the permit application with the U.S. EPA. On March 31, 1982, the U.S. EPA requested that the Respondent submit Part B of the permit application. The Respondent submitted Part B to U.S. EPA on October 3, 1982. A RCRA permit to store hazardous waste was issued to Respondent for this facility on September 27, 1984. A third party request for review of that permit, filed November 7, 1984, was later withdrawn before it was considered by the administrative law judge. The final permit became effective on August 25, 1985.

8. The State of Ohio, at the time the permit was issued and effective, was not authorized to administer and enforce a State hazardous waste program under RCRA. The State of Ohio later obtained such authorization.

9. The Respondent's hazardous waste activity consists of generating and storing dust stop waste, spent halogenated solvents, spent non-halogenated solvents, still bottoms from recovery of spent non-halogenated solvents and electroplating sludge. These wastes have been identified and listed as hazardous waste under Section 3001 of the Act (U.S. EPA Hazardous Waste Nos. D006, F002, F003, F005 and F006).

10. On September 7, 1990, the OEPA conducted a RCRA inspection of Respondent's facility and observed the following violations:

A. The permit states, in part, in II. General Facility Conditions, at C. General Waste Analysis, "The Permittee shall follow the procedures described in the attached Waste Analysis Plan, Attachment II." The Waste Analysis Plan states, in part, at (3)(v) Sample Log, "A sample log is maintained stating type of sample taken, method used to obtain sample and the date it was sent to the Stilson Laboratory for analysis." The permit further states, in part, in I. Standard Conditions, at D.9 (c), "Records of monitoring information shall specify:

- (i) The dates, exact place, and times of sampling or measurements;
- (ii) The individuals who performed the sampling or measurements;
- (iii) The dates analyses were performed;
- (iv) The individuals who performed the analyses;
- (v) The analytical techniques or methods used; and

(vi) The results of such analyses."

Since the records of sampling and analysis for EPA waste codes F003, F005 and F006 kept by Respondent did not contain the information required by these permit conditions, the Respondent was in violation of the permit and of 40 CFR 270.30(a), which requires permittees to comply with all permit conditions.

B. The permit states, in part, in II. General Facility Conditions, at F. Personnel Training, "The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment (IV). The permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e)." Attachment IV states, in part, at (12)(xii) [on page 100g of Attachment IV], "Employees are required to meet twice per year for review and update of this training program." Since Respondent's training records do not reflect review of training at the specified interval, the Respondent was in violation of the permit and of 40 CFR 270.30(a), which requires permittees to comply with all permit conditions.

C. The permit states, in part, in Attachment V, Contingency Plan, at IV.A. Notification Procedure for Spill [pages 53, 64 and 65 of the attachment], that N.L. Orr (also referred to as Norman Orr) is the designated Emergency Coordinator for the facility. Alternate Emergency Coordinator designees listed are S.E. Lizer, M.E. Hawse, L.T. Poteet, S.W. Morris and D.H. Bibb. At the time of the OEPA inspection on September 7, 1990, N.L. Orr was no longer employed by the Respondent and another emergency coordinator had been designated. In addition, none of

the five alternate emergency coordinator designees named in the permit any longer has that responsibility. The regulations list "Changes in name, address or phone number of coordinators or other persons or agencies identified in the plan," (under 40 CFR 270.42, Appendix I, Item B.6. Contingency Plan, at d) as a Class 1 modification of a permit. The regulations for Class 1 modifications require notification of the U.S. EPA Regional Administrator or the State Director of such modification by certified mail within seven (7) calendar days after the change is put into effect. Since no such notification was made to the U.S. EPA or to the OEPA, the Respondent was in violation of 40 CFR 270.42.

D. The permit states, in part, in I. Standard Conditions, at D.10. Reporting Planned Changes, "The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility, within ten (10) days of the decision to make the change." Since Respondent failed to notify the Administrator of the removal of a solvent still from the facility, the Respondent was in violation of the permit and 40 CFR 270.30(a), which requires permittees to comply with all permit conditions.

COMPLIANCE ORDER

Respondent having been initially determined to be in violation of the above cited rules and regulations, the following Compliance Order pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, is entered:

A. Respondent shall immediately upon this Order becoming final, cease all treatment, storage or disposal of any hazardous waste except such treatment,

storage, or disposal that is in complete compliance with the conditions of its hazardous waste permit, except as provided in Paragraph B below.

B. Respondent shall, within thirty (30) days of this Order becoming final, maintain sample logs and records of hazardous waste monitoring containing the following information:

1. Sample log:

- (a) Type of sample taken;
- (b) Method used to obtain sample; and
- (c) Date it was sent to the Stilson Laboratory for analysis.

2. Records of monitoring information:

- (a) The dates, exact place, and times of sampling or measurements;
- (b) The individuals who performed the sampling or measurements;
- (c) The dates analyses were performed;
- (d) The individuals who performed the analyses;
- (e) The analytical techniques or methods used; and
- (f) The results of such analyses.

C. Respondent shall, within ten (10) days of this Order becoming final, submit a modification for its permit, according to procedures set forth in 40 CFR 270.42, to designate a new Emergency Coordinator and alternates. Within twenty (20) days thereafter, Respondent shall provide the U.S. EPA with a copy of an amended contingency plan reflecting these changes.

D. Respondent shall, within ten (10) days of this Order becoming final, notify the Regional Administrator and OEPA by certified mail of the removal of the solvent still and other physical changes in the plant made since the

permit was effective on August 25, 1985. Within twenty (20) days thereafter, Respondent shall provide the U.S. EPA and OEPA with a copy of an amended contingency plan reflecting any alteration in emergency response necessitated by these physical changes.

E. Respondent shall, within 30 days of this Order becoming final, provide review of training to its hazardous waste personnel and shall document such review in its operating record. The Respondent shall, thereafter, provide such review twice yearly as required by the conditions of its permit.

D. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order and any part thereof. This notification shall be submitted no later than the time stipulated above to the U.S. EPA, Region V, Waste Management Division, 230 South Dearborn Street, Chicago, Illinois 60604. Attention: Jane Neumann, RCRA Enforcement Branch, 5HR-12.

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to Michael Savage, Assistant Chief, Inspections and Enforcement Programs, Division of Solid and Hazardous Waste Management, Ohio Environmental Protection Agency, Post Office Box 1049, Columbus, Ohio 43266-0149.

Notwithstanding any other provisions of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at this facility may present an imminent and substantial endangerment to human health or the environment.

PROPOSED CIVIL PENALTY

In view of the above determination and in consideration of the seriousness of the violations cited herein, the potential harm to human health and the environment, the continuing nature of the violations, and the ability of the Respondent to pay penalties, the Complainant proposes to assess a civil penalty in the amount of NINE THOUSAND FIVE HUNDRED TWENTY-FIVE DOLLARS (\$9,525) against the Respondent, pursuant to Sections 3008(c) and 3008(g) of RCRA, 42 U.S.C. §6928. Attachment 1 of the Complaint provides a detailed summary of the proposed civil penalty. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States of America and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division (5MF-14), and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel (5CS-TUB-3), U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

Failure to comply with any requirements of the Order shall subject the above named Respondent to liability for a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000) for each day of continued noncompliance with the deadlines contained in this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c). U.S. EPA may collect interest on any amount overdue under the terms of this Compliance Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. §3717. A late payment handling charge of \$20.00 will be imposed on any late payment, with an additional charge of \$10.00 for any subsequent 30-day period over

which an unpaid balance remains. In addition, a six percent per annum penalty will be applied on any principal amount not paid within ninety (90) days of the date on which payment is due.

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material, factual allegation set forth in the Complaint and Compliance Order or the appropriateness of any proposed compliance schedule or penalty. Unless Respondent has filed an answer not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order. U.S. EPA may collect interest on any amount overdue under the terms of this Compliance Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. §3717. A late payment handling charge of \$20.00 will be imposed on any late payment, with an additional charge of \$10.00 for any subsequent 30-day period over which an unpaid balance remains. In addition, a six percent per annum penalty will be applied on any principal amount not paid within ninety (90) days of the date on which payment is due.

To avoid a finding of default by the Regional Administrator you must file a written answer to this Complaint with the Regional Hearing Clerk, Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days of receipt of this notice.

A copy of your answer and any subsequent documents filed in this action should be sent to Nicholas R. Bollo, Assistant Regional Counsel (5CS-TUB-3), at the

same address. Failure to answer within thirty days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of penalty sought in the Complaint is due and payable and subject to interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §3701 et seq.

Respondent's answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has knowledge. Said answer should contain (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which Respondent intends to place at issue in the hearing. The denial of any material fact, or the raising of any affirmative defense, shall be construed as a request for a hearing.

The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, are applicable to this administrative action. A copy of these Rules is enclosed with this Complaint.

SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may confer informally with U.S. EPA concerning: (1) whether the alleged violations in fact occurred as set forth above; (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any proposed penalty in relation to the size of Respondent's business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business. Respondent may request an informal settlement conference at any time by contacting this

office. Any such request, however, will not affect either the thirty-day time limit for responding to this Complaint or the thirty-day time limit for requesting a formal hearing on the violations alleged herein.

U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conference. A request for an informal conference should be made in writing to Jane Neumann, RCRA Enforcement Branch (5HR-12), U.S. Environmental Protection Agency, at the address cited above, or by calling her at (312) 886-2871.

Dated this 7th day of March, 1991.

Sally K. Swanson
William E. Muno *for*
Associate Division Director
Office of RCRA

Complainant
U.S. Environmental Protection Agency
Region V

CERTIFICATION OF SERVICE

I hereby certify that I have caused a copy of the foregoing Complaint to be served upon the persons designated below, on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified-return receipt requested, postage prepaid, at Chicago, Illinois, in envelopes addressed to:

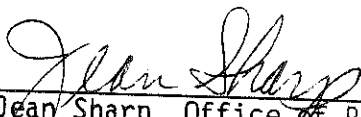
Prentice-Hall Corporate System and
Registered Agent for
Borden, Inc., Columbus Coated Fabrics
380 South Fifth Street
Columbus, Ohio 43215

W. Bailey Barton, Director
Environmental Affairs
Borden, Inc.
1280 North Grant Avenue
Columbus, Ohio 43201

These are said persons' last addresses known to the subscriber.

I have further caused the original of the Complaint and this Certificate of Service to be served in the Office of the Regional Hearing Clerk (5MF-14) located in the Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

Dated this 12 day of March, 1991.


Jean Sharp, Office of RCRA
U.S. EPA, Region V

ATTACHMENT 1

PENALTY SUMMARY

Federal Regulation/ Permit Condition	Nature of Requirement	Date of Violation	Penalty Assessed
40 CFR 270.30(a)/ I.D. 9(c) and II.C	Sample log and records of monitoring and analysis	Sept. 7, 1990	\$ 300
40 CFR 270.30(a)/ II.F	Personnel Training	1986-1990	\$ 800
40 CFR 270.42	Change in emergency coordinators	Sept. 7, 1990	\$1,000
40 CFR 270.30(a)/ I.D. 10	Reporting physical changes to the facility	Sept. 7, 1990	\$7,425

JAN 24 1991

5HR-12

Mr. William Ilg
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43201

Re: Return to Compliance
Columbus Coated Products
OHD 004 294 351

Dear Mr. Ilg:

We have received and reviewed your letter of December 3, 1990, regarding our Notice of Violation (NOV) dated October 25, 1990.

The information submitted with your letter appears to meet the requirements of the land disposal restriction regulation found at 40 CFR Part 268. We have, therefore, returned this facility to compliance for those violations cited in our NOV.

If you should have any further questions, please contact Jane Neumann of my staff at (312) 886-2871.

Sincerely yours,

Ann Budich, Acting Chief
IN/MN/OH Enforcement Program Section

cc: Mike Savage, OEPA
Cliford Morton, CDO

bcc: Ann Budich, REB
5HR-JCK-\neumann\walker\6-8093 \jane\william\January 23, 1991

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
<i>AW</i> 1-23-91	<i>JW</i> 1-23-91	<i>ab</i> 1-24-91	

JAN 24 1991

5HR-12

Linda Welch, Chief
Ohio Environmental Protection Agency
Division of Solid and Hazardous Waste
Management
Post Office Box 1049
Columbus, Ohio 43266-0149

Re: Complaint
Columbus Coated Fabrics
OHD 004 294 351

Dear Ms. Welch:

Pursuant to Section 3008(a)(2), of the Resource Conservation and Recovery Act (RCRA), this letter provides notice to you that the United States Environmental Protection Agency (U.S. EPA) is preparing to issue an Order under Section 3008(a)(1) to Columbus Coated Fabrics (CCF). This action is being taken in response to a referral from the Ohio Environmental Protection Agency (OEPA). An inspection of the CCF facility by OEPA on September 7, 1990, revealed violations of federal permit requirements.

If you have any questions about this Order, please contact Ms. Jane Neumann of my staff at (312) 886-2871.

Sincerely yours,

Joseph Boyle, Acting Chief
RCRA Enforcement Branch

cc: Mike Savage, OEPA
5HR-JCK-neumann,walker 6-8093 diskette #6 filename: linda.welch

api-18-91

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
<i>PN</i> <i>12/10/90</i>	<i>JN</i> <i>12/14/90</i>	<i>ab</i> <i>1-11-91</i>	<i>(Acting)</i> <i>GMB</i> <i>1/22/91</i>

RCRA ENFORCEMENT ACTION SIGN-OFF

PART I. BACKGROUND

FACILITY NAME Borden Inc., Columbus Coated Fabrics
 FACILITY LOCATION 1280 N. Grant Ave., Columbus, Ohio
 RCRA ID NUMBER OH0 004 294 351
 ASSIGNEES REB Jane Neumann ORC _____
 NATURE OF VIOLATION Violations of permit conditions
 DATE OF DISCOVERY September 7, 1990
 DATE OF REFERRAL October 2, 1990 () NOT APPLICABLE
 ANY OTHER OUTSTANDING OR PAST ENFORCEMENT ACTIONS AGAINST THIS FACILITY:
None

PART II. RECOMMENDATION Issue 3008 Compliance Order

PART III. CONCURRENCES ON DRAFT

	INITIALS	DATE	AGREE	DISAGREE
51812 PREPARER	<u>JN</u>	<u>12-31-90</u>	(X)	()
CHIEF, RCRA ENF. SECTION	<u>als</u>	<u>1-11-91</u>	(X)	()
(Acting) CHIEF, RCRA ENF. BRANCH	<u>JMB</u>	<u>1/22/91</u>	(X)	()
ASSISTANT REGIONAL COUNSEL	<u>Nick Bollo</u>	<u>12/8</u>	(X)	()

with noted changes

PART IV. NAME & DATE OF 3008(a)(2) NOTICE LETTER Linda Welch, OEPA
1-24-91

PART V. APPROVAL

1. PREPARER	<u>JN</u>	<u>2-13-91</u>	(X)	()
2. CHIEF, RCRA ENF. SECTION	<u>als</u>	<u>2-13-91</u>	(X)	()
3. CHIEF, RCRA ENF. BRANCH	<u>JMB</u>	<u>2/26/91</u>	(X)	()
4. ASSISTANT REGIONAL COUNSEL	<u>NB</u>	<u>3/2</u>	(X)	()
(Rec'd 3/2) 5. CHIEF, S.W. & E.R. SECTION	<u>als</u>	<u>3/2</u>	(X)	()
6. ASSOC. DIR., OFFICE OF RCRA	<u>SKS</u>	<u>3/7</u>	(X)	()

- 4/1 comment

NOTE: Attach sign-off sheets to yellow copy of the enforcement action.

Different case

RECEIVED
WMD RCRA
RECORD CENTER
DEC 22 1990

DEC 28 1990

5HR-12

Mr. William Ilg
Columbus Coated Fabrics
1280 North Grant Street
Columbus, Ohio 43201

Re: Return to Compliance
Columbus Coated Fabrics
OHD 004 294 351

Dear Mr. Ilg:

We have received and reviewed your letter of December 3, 1990, regarding our Notice of Violation (NOV) dated October 25, 1990.

The information submitted with your letter appears to meet the requirements of the land disposal restriction regulation found at 40 CFR Part 268. We have, therefore, returned this facility to compliance for those violations cited in our October 25, 1990, NOV.

If you should have any further questions, please contact Jane Neumann of my staff at (312) 886-2871.

Sincerely yours,

Ann Budich, Acting Chief
IN/MN/OH Enforcement Program Section

cc: Mike Savage, OEPA
Clifford Morton, CDO

bcc: Ann Budich, REB
5HR-JCK-neumann.walker 6-8093 diskette #6 filename: will.iig

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
PN 12/14/90	JN 12-14-90	ab 12-17-90	

12-5-90
Conference call

Pam Allen - ^{RCA} enforcement ~~Coordinator~~ ^{Section} Supervisor
Andy Kubalak - inspector 644/771-7505
Lundy Adelsberger, CDO Group leader

They did have records - not the right info.

Problem was for all waste streams.

Now he changed that - he is not certain so he says he would have to check it out.

C&F has since supplied anal. results for F wastes dating from 8-10-90 samples.

May need an info. request

New contingency plan sent in last wk. -
Andy will send

Were providing training annually +
was documenting - also annual review.

- They have corrected job descriptions
- in response to Ohio NOV
- Content of training adequate

Andy feels this is a very cooperative facility.

Lundy agrees - they make changes requested

Pam - no intention to escalate @ this time

Andy - new deadline is Dec. 17 for RTC

They are being responsive to suggestions for changes in app.

They've had a recent inspection by air team from OEPA

re: land ban - ~~co.~~ officials were ^{very} concerned
Lundy told them to send examples

2 Did CCF respond and RTC? If so, drop that.
If not, lobby to combine them.

Letter to Ohio saying we're writing an order

Has CCF been sending biennial reports? Copy of most recent.

Are they sampling any wastes at all?

Did they @ some time in the past?

What wastes do they currently produce?

Any change from original permit, ~~Att.~~ VII?

Air emissions current problem?

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



December 3, 1990

U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

Attention: Sally K. Swanson (5HR-12)

Dear Ms. Swanson:

In response to your letter of October 25, 1990 concerning violation of the land disposal regulations, we are currently shipping all of our restricted waste using a land disposal restriction form that contains the applicable treatment standards. Following the Ohio EPA's August 14, 1989 inspection, a memorandum was sent to facility staff instructing them on the proper attachments to the manifests (see enclosed). Also enclosed are examples of manifests showing the applicable treatment standards attached.

Columbus Coated Fabrics is keeping a copy of all land disposal notifications on site for at least five (5) years.

All facility staff completing these notification forms have been trained to insure compliance with all regulations.

Very truly yours,


William G. Ilg
Environmental Coordinator



**INTER-COMPANY AND OFFICE CORRESPONDENCE**

TO: DISTRIBUTION

FROM: BILL ILG

LOCATED AT: C C F

SUBJECT: ANNUAL CCF HAZARDOUS WASTE
INSPECTION 9,10,11 & 14,
AUGUST 1989


DATE: 27 OCTOBER 1989

{ Dept.
Branch
Division
Company

DURING AN INSPECTION OF THE CCF FACILITY (INCLUDING PLATING AND ENGRAVING DEPARTMENTS) THE FOLLOWING ITEMS CONCERNING SHIPMENTS OF WASTES FROM THE FACILITY WERE MENTIONED BY THE OHIO EPA AND MUST BE FOLLOWED:

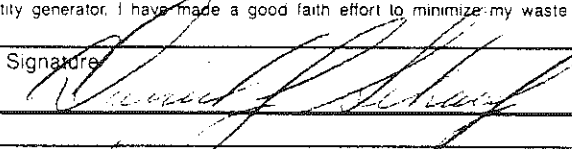

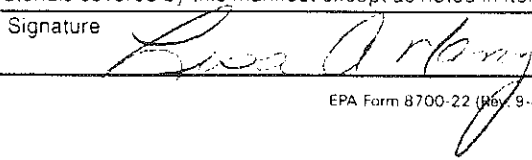
- * All hazardous waste manifests that have the EPA I.D. numbers F003; F005; (either one or any combination of these numbers) are to have a properly filled out LAND DISPOSAL RESTRICTION NOTIFICATION FORM stapled to the manifest as well as the form titled "CONSTITUENT LIMITATIONS IN ANY WASTE TO BE LAND DISPOSED". These are the two yellow forms in the attachment. In addition, a copy of these two forms is to be stapled to the Generator copy of the manifest which is retained in the manifest file.
- * If the waste shipped is an F006 waste, it also is to have a correctly filled out LAND DISPOSAL RESTRICTION NOTIFICATION FORM stapled to the manifest as well as the form titled "CONSTITUENT LIMITATIONS IN ANY WASTE TO BE LAND DISPOSED". These are the two green forms in the attachment. In addition, a copy of these two forms is to be stapled to the Generator copy of the manifest which is retained in the manifest file.
- * The known waste streams at present which are to have the above noted numbers included in the waste I.D. numbers are:
 1. The wastes on manifests described as "Pan Wash Residue" are to have F005 in the waste No. column as well as in parenthesis after the DOT description. Presently this waste is being shipped to Rineco Chemical Industries in Benton, Arkansas.
 2. Waste Ink that is shipped for either recycling or for use in a fuel blending program known as "R.Q. Waste Flammable Liquid - (Waste Ink)" is to have F003 and F005 on the manifest in the waste No. column as well as after the DOT description. Presently this waste ink is being shipped to Safety-Kleen in New Castle, Kentucky.

3. The waste on manifests described as "Plating Pit Residue and or Sludge" is to have F006 on the manifest in the waste No. column as well as after the DOT description. Presently this plating pit waste is being shipped to Tricil in Hilliard, Ohio.


BILL ILG

WGI/201

DISTRIBUTION: G. BENSON
D. BIBB
K. GREENE
M. HORVITZ - CORPORATE LAW
J. MAYO
G. MYRES
G. RUSINCOVITCH
D. SCHAFF
G. THOMAS

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OH D 0 0 4 2 9 4 3 5 1 0 0 2 6 7										Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.				
GENERATOR	3. Generator's Name and Mailing Address Columbus Coated Fabrics 1280 N. Grant Ave. Columbus, OH 43201												A. State Manifest Document Number 01-25-0145							
	4. Generator's Phone (614) 297-6097												B. State Generator's ID							
	5. Transporter 1 Company Name Schneider Tank Lines						6. US EPA ID Number W I D 9 8 0 9 0 4 7 4 2						C. State Transporter's ID							
	7. Transporter 2 Company Name						8. US EPA ID Number						D. Transporter's Phone 800-558-5091							
	9. Designated Facility Name and Site Address Systech Environmental Corp. County Road 176 Paulding, OH 45879						10. US EPA ID Number OH D 0 0 5 0 4 8 9 4 7						E. State Transporter's ID							
													F. Transporter's Phone							
													G. State Facility's ID							
													H. Facility's Phone 419-399-4835							
	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)												12. Containers		13. Total Quantity		14. Unit Wt/Vol		I. Waste No.	
	a. RQ R.Q. Waste Flammable Liquids NOS UN1993 (Waste Ink) F003-F005-D001												0 0 1 TT		05730 G		F003 F005 D001			
b.																				
c.																				
d.																				
J. Additional Descriptions for Materials Listed Above												K. Handling Codes for Wastes Listed Above								
15. Special Handling Instructions and Additional Information																				
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																				
Printed/Typed Name Daniel J. Schaaf												Signature 				Month Day Year 0 1 1 7 9 0				
TRANSPORTER	17. Transporter 1 Acknowledgement of Receipt of Materials																			
	Printed/Typed Name Joe Chiatello						Signature 						Month Day Year 0 1 1 7 9 0							
	18. Transporter 2 Acknowledgement of Receipt of Materials																			
Printed/Typed Name						Signature						Month Day Year								
FACILITY	19. Discrepancy Indication Space																			
	20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.																			
Printed/Typed Name LISA A. MANZ						Signature 						Month Day Year 0 1 1 7 9 0								

TO SYSTECH CORPORATION
REGARDING SHIPMENT OF WASTES
RESTRICTED FROM LAND DISPOSAL
UNDER 40 CFR 268.7(a)(1)

This notification is submitted by William G. Ilg
to SYSTECH Corporation in accordance with the Land Disposal Restrictions,
Final Rule (effective Nov. 8, 1986) under 40 CFR 268.7(a)(1). According to
this final rule, generators of EPA Hazardous Waste Numbers F001 to F005 must
provide the following information with each shipment delivered to SYSTECH:

1. EPA Hazardous Waste Number(s): OHF 004 294 351
2. Corresponding Treatment Standard (see below).
3. Manifest number associated with this shipment: 00267
4. Waste analysis data (attach if different from SYSTECH qualification analysis).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in this waste or
its extract, check the appropriate box in front of the
treatment standard(s) which apply.

Solvent Constituent	Treatment Standard (mg/liter)	
	Wastewaters containing spent solvents	All other spent solvent wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	0.05	0.96
Chlorobenzene	0.15	0.05
Cresols and cresylic acid	2.82	0.75
Cyclohexanone	0.125	0.75
1,2-Dichlorobenzene	0.65	0.125
Ethyl acetate	0.05	0.75
Ethyl benzene	0.05	0.053
Ethyl ether	0.05	0.75
Isobutanol	5.0	5.0
Methanol	0.25	0.75
Methylene chloride	0.20	0.96
Methylene chloride (from the pharmaceutical industry)	12.7	0.96
Methyl ethyl ketone	x 0.05	0.75
Methyl isobutyl ketone	x 0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,1,2-Trichloroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
		0 H D 00 4 29 4 35 1 0 0 2 9 8		10 0 2 9 8					
3. Generator's Name and Mailing Address Columbus Coated Fabrics 1280 North Grant Ave. Cols, OH. 43201		4. Generator's Phone (614) 297 6043		5. Transporter 1 Company Name Chemfreight		6. US EPA ID Number 10 HD 9 86 9 66 1 90		A. State Manifest Document Number	
								B. State Generator's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		9. Designated Facility Name and Site Address Chemical Solvents, Inc. 1010 Denixon Rd. Cleveland, Oh 44109		10. US EPA ID Number 10 HD 9 80 8 97 6 56		C. State Transporter's ID	
								D. Transporter's Phone 216/341-2500	
								E. State Transporter's ID	
								F. Transporter's Phone	
								G. State Facility's ID	
								H. Facility's Phone 216/741 9310	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol		1. Waste No.	
a. <input checked="" type="checkbox"/> R.Q. Waste Flammable Liquids NOS (Methyl Ethyl Keytone, Methyl Isobutyl Keytone) UN1993 (Waste Ink) F003-F005-D001		b. 1		TT		06090		G F003 F005 D001	
b. Flammable									
c.									
d.									
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above T63			
15. Special Handling Instructions and Additional Information									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name Daniel J. Schaaf						Signature <i>Daniel J. Schaaf</i>		Month Day Year 10 2 29 0	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name William Gordon						Signature <i>William Gordon</i>		Month Day Year 10 2 29 0	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name						Signature		Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name Bob GARRON						Signature <i>Bob Garrison</i>		Month Day Year 10 2 29 0	

**GENERATOR NOTIFICATION TO CHEMICAL SOLVENTS, INC,
REGARDING SHIPMENT OF WASTES RESTRICTED FROM LAND DISPOSAL**

This notification is submitted by Columbus Coated Fabrics
to Chemical Solvents, Inc. in accordance with the Land Disposal Restrictions under 40 CFR 268.7(a)(1).
According to this final rule, generators of a restricted waste must provide the following information with each
shipment delivered.

1. EPA Hazardous Waste Number(s): F003, F005, D001
2. Manifest number associated with this shipment: 00298 Date 10/22/90
3. Manifest line number for this stream (e.g. 11a, 11b): 11a
4. Waste characterization (check one): ☐ analysis is attached ☒ is based on knowledge of waste and
generating process

**** (X) ALL OF THE FOLLOWING THAT ARE APPLICABLE FOR YOUR WASTE & FILL OUT ONE FORM PER STREAM ****

RESTRICTED WASTE

F001 - F005	CHECK IF PRESENT IN EXCESS OF GIVEN LIMIT	CONCENTRATION MGL	
		WASTE WATER CONTAINING SPENT SOLVENTS	SPENT SOLVENT WASTE
ACETONE	_____	0.05	0.59
BENZENE	_____	0.07	3.7
N-BUTYL ALCOHOL	_____	5.00	5.00
CARBON DISULFIDE	_____	1.05	4.81
CARBON TETRACHLORIDE	_____	0.05	0.96
CHLORO BENZENE	_____	0.15	0.05
CRESOLS (AND CRESYLIC ACID)	_____	2.82	0.75
CYCLOHEXANONE	_____	0.125	0.75
1,2 - DICHLORO BENZENE	_____	0.65	0.125
ETHYL ACETATE	_____	0.05	0.75
ETHYL BENZENE	_____	0.05	0.053
ETHYL ETHER	_____	0.05	0.75
ISOBUTANOL	_____	5.00	5.00
METHANOL	_____	0.25	0.75
METHYLENE CHLORIDE	_____	0.20	0.96
METHYL ETHYL KETONE	<u>X</u>	0.05	0.75
METHYL ISOBUTYL KETONE	<u>X</u>	0.05	0.33
NITRO BENZENE	_____	0.66	0.125
PYRIDINE	_____	1.12	0.33
TETRACHLOROETHYLENE	_____	0.079	0.05
TOLUENE	_____	1.12	0.33
1,1,1 - TRICHLOROETHANE	_____	1.05	0.41
1,1,2 - TRICHLOROETHANE	_____	.03	7.6
1,1,2 - TRICHLORO-	_____		
1,2,2 - TRIFLUOROETHANE	_____	1.05	0.96
TRICHLOROETHYLENE	_____	0.062	0.091
TRICHLOROFLUOROMETHANE	_____	0.05	0.96
XYLENE	_____	0.05	0.15

CALIFORNIA LISTED

- _____ NICKEL AND OR COMPOUNDS WITH MORE THAN 134 MG/L
 _____ THALLIUM AND OR COMPOUNDS WITH MORE THAN 130 MG/L
 _____ HAZARDOUS WASTE WITH MORE THAN 50 PPM PCB'S
 _____ HAZARDOUS WASTE WITH MORE THAN 1000 PPM HALOGENATED ORGANIC COMPOUNDS

(continued - other side)

=====

If you are shipping a hazardous or restricted waste and none of the preceding categories apply, please check the following, as applicable.

<u> </u> WASTEWATER	<u> X </u>	NON-WASTEWATER (SOLVENT)
<u> X </u> D001	<u> </u>	IGNITABLE WASTEWATER PER 261.21(a)1
	<u> </u>	IGNITABLE < 10% TOTAL ORGANIC CARBON
	<u> </u>	IGNITABLE > 10% TOTAL ORGANIC CARBON
<u> </u> D002**	<u> </u>	pH < 2.0
	<u> </u>	pH > 12.5
	<u> </u>	CORROSIVE PER 261.22(a)2

If the waste is not an F-series or California waste but it is D001 or D002, it must be treated as specified in 40 CFR 268.42 [i.e. INCIN(eration) or DEACT(ivation)].

=====

If none of the above categories apply, see 40 CFR 268.7 (including the June 1, 1990 revisions) to determine the waste code. Enter this waste code on the space provided and then check the applicable treatment standard.

 EPA WASTE CODE

 TREATMENT STANDARD 40 CFR 268.41
 TREATMENT STANDARD 40 CFR 268.43

AUTHORIZED SIGNATURE

Shaver Thomas

TITLE Environmental Manager

DATE

10/22/90

**CSI IS NOT PERMITTED TO ACCEPT CORROSIVE INORGANICS OR REACTIVE WASTES

9/21/90

Questions + thoughts on OSHA memo

1. What was included in their record? Nothing?
 No data on testing? Only data on other waste streams? All data for other waste streams + only some data on the three mentioned?
 Do we know if they sample + test at all but just don't record the monitoring info?
 Aren't they in violation of 9(b) if no log exists?
 Are they actually then in violation of 9(a-c) because they couldn't prove they did the sampling?
 What kind of waste must they sample other than still wastes + electroplating wastes?

2. ~~What about pages 30, 32, 33, etc.~~
 Not a violation to not have still - a violation to not report it. Violation is ~~I.D. 7 (Duty to Provide Info)~~
~~I.D. 10. (Reporting Planned Changes)~~
 Possibly a violation of II. I. 3. (ref. 40 CFR 264.54 (c) must amend cont. plan if... the facility changes... in a way that changes the response necessary in an emergency.
 Violation for not reporting to us
 Violation for varying from closure plan (i.e. timetable)
~~that changes~~ 270.42 - only if it's not a recycling unit (RCRA exempt)

3. Is this the same as #1 above?
no this is for method of sampling

#4. Permit condition reflected in ~~Att~~ III. 5. i - first 17
Do they not have a loading dock foreman?
(We assume they no longer have a still area foreman.)

leave it out - let Ohio negotiate for a correction
in the state permit

5. Form changed - data recorded the same as permit
requires - not a violation

6. Combine this w/ the other personnel changes. ~~Ask the permits people if permits currently being issued incorporate organizational charts & names of personnel. If not, do we want to cite them for a violation for failing to notify? Have they filed biennial reports & mentioned such changes?~~

~~Technically~~ Effectively the same as violation #14.

40 CFR 264.16 (Personnel Training) doesn't appear to require reporting changes to EPA, merely keeping it in company's records.

7. What, if any, training is reflected in the records? Does the inspector have any knowledge of whether the training is occurring?
- 40 CFR 264.16 (d) & (e) ~~require~~ require only that the facility maintain a record of the names.

8. Seems to be covered in other violations

9. How is this one different from # 7?

10. Part II.H.5 requires the Permittee to attempt to make arrangements and document refusal in operating record if such occurs. It does not require the Permittee to describe those arrangements in the contingency plan or elsewhere. The ~~contingency plan~~^{final permit} as issued, includes only copies of letters showing CCF submitted copies of their plan to local parties. The substance of the letters would appear not to meet the requirements of 40 CFR 264.37 for an attempt. Nonetheless, ~~they~~ this meager effort got tacit approval when the permit was issued. This was then addressed in the third party appeal, and resulted in an MOU between CCF + local parties which may satisfy this requirement. Do we need to recontact local authorities to check current status?

* 40 CFR 264.52(c) does require such description

11. True enough, but failing to delete parts of a contingency plan are not very serious violations. ~~Also~~ Also, the intent of 40 CFR 264, Subparts C and D seem to be entirely focused on preventing or dealing w/ spills of h.w. The cited part of the CCF Contingency Plan seems to address potential spills of process chemicals. Perhaps that should never have been in the approved Contingency Plan.

12. Specifically violates 40 CFR 264.54(d)
(Requires amendment when list of emergency coordinators changes)

13. This violates 40 CFR 264.54(c) ... changes the necessary response necessary in an emergency.

14. Same violation as #12, Also shown on p. 65

15. This is a duplication of #12. His company title is Safety Coordinator. Title of concern in our regs is Emergency Coordinator, which is covered in #12

Is the solvent still a RCRA-exempt recycling unit? If it is, CCF may have had no obligation to report it's deletion.

Is spilled cyanide bath a solid waste/h.w.?

C

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



October 26, 1990

OEPA
Mr. Ken Schultz
Chief, Emergency Response Section
1800 WaterMark Drive
P. O. Box 1049
Columbus, Ohio 43266-0149

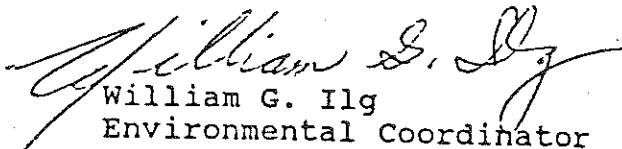
Dear Mr. Schultz:

Enclosed are the latest changes to the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan and the RCRA Contingency Plan for the Facility at Grant Avenue.

Please replace the corresponding pages with these revised pages.

Please contact me concerning any questions.

Very truly yours,


William G. Ilg
Environmental Coordinator
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden, Inc.

Enclosure

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



October 26, 1990

Grant Hospital
Administration
111 South Grant Avenue
Columbus, Ohio 43215

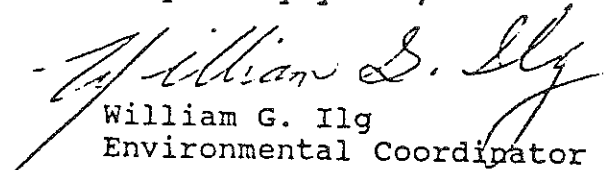
Dear Sir:

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Please contact me concerning any questions.

Very truly yours,


William G. Ilg
Environmental Coordinator
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden, Inc.

Enclosure

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



October 26, 1990

Doctors Hospital - North
Administration
1087 Dennison Avenue
Columbus, Ohio 43201

Dear Sir:

Enclosed are the latest changes to the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan and the RCRA Contingency Plan for the Facility at Grant Avenue.

Please replace the corresponding pages with these revised pages.

Please contact me concerning any questions.

Very truly yours,

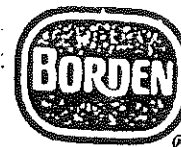
William G. Ilg

William G. Ilg
Environmental Coordinator
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden, Inc.

Enclosure

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



October 26, 1990

Riverside Hospital
Administration
3535 Olentangy River Road
Columbus, Ohio 43214

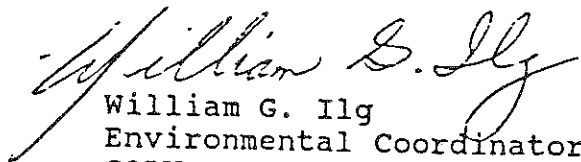
Dear Sir:

Enclosed are the latest changes to the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan and the RCRA Contingency Plan for the Facility at Grant Avenue.

Please replace the corresponding pages with these revised pages.

Please contact me concerning any questions.

Very truly yours,


William G. Ilg
Environmental Coordinator
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden, Inc.

Enclosure

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



October 26, 1990

University Hospital
Administration, S-101 Rhodes Hall
450 West 10th Avenue
Columbus, Ohio 43210

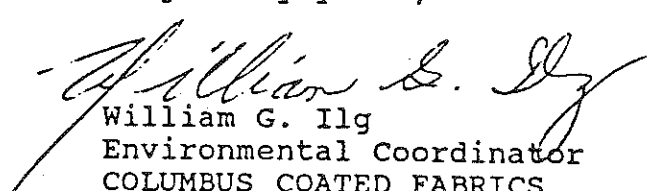
Dear Sir:

Enclosed are the latest changes to the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan and the RCRA Contingency Plan for the Facility at Grant Avenue.

Please replace the corresponding pages with these revised pages.

Please contact me concerning any questions.

Very truly yours,


William G. Ilg
Environmental Coordinator
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden, Inc.

Enclosure

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



October 26, 1990

Michael J. Pompili, MS, RS
Assistant Health Commissioner
Environmental Health Division
Columbus Health Department
181 Washington Boulevard
Columbus, Ohio 43215-4096

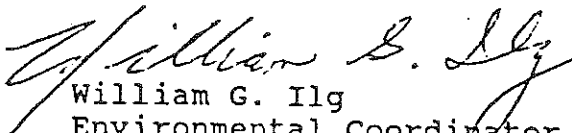
Dear Mr. Pompili:

Enclosed are the latest changes to the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan and the RCRA Contingency Plan for the Facility at Grant Avenue.

Please replace the corresponding pages with these revised pages.

Please contact me concerning any questions.

Very truly yours,


William G. Ilg
Environmental Coordinator
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden, Inc.

Enclosure

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



October 26, 1990

James Jackson
Police Chief
City of Columbus
Police Division
120 West Gay Street
Columbus, Ohio 43215

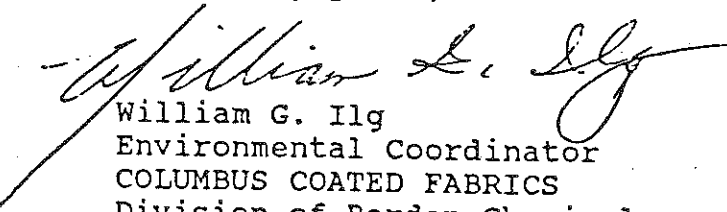
Dear Chief Jackson:

Enclosed are the latest changes to the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan and the RCRA Contingency Plan for the Facility at Grant Avenue.

Please replace the corresponding pages with these revised pages.

Please contact me concerning any questions.

Very truly yours,


William G. Ilg
Environmental Coordinator
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden, Inc.

Enclosure

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



October 26, 1990

Don Warner
Fire Chief
Division of Fire
City of Columbus
200 Greenlawn Avenue
Columbus, Ohio 43223

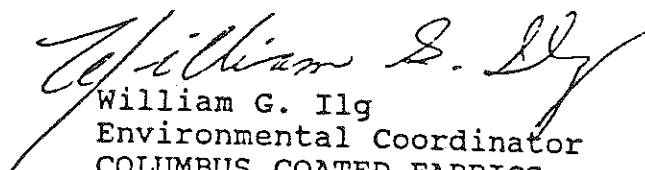
Dear Chief Warner:

Enclosed are the latest changes to the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan and the RCRA Contingency Plan for the Facility at Grant Avenue.

Please replace the corresponding pages with these revised pages.

Please contact me concerning any questions.

Very truly yours,


William G. Ilg
Environmental Coordinator
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden, Inc.

Enclosure

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. (Extra charge) 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:
Mr. William Ilg
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43201

4. Article Number
P 564 588 633

Type of Service:

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and **DATE DELIVERED**.

5. Signature — Addressee

X *Wm Ilg*

6. Signature — Agent

X *Wm Ilg*

7. Date of Delivery

10/29

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Apr. 1989

★ U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

Ann Budich 5HR-12



PENALTY FOR PRIVATE
USE, \$300

RETURN
TO



Print Sender's name, address, and ZIP Code in the space below.

U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

MT Kape
Box 67

OCT 25 1990

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William Ilg
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43201

Re: Notice of Violation
Columbus Coated Fabrics
OHD 004 294 351

Dear Mr. Igl:

On August 14, 1989, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of Chapter 3734 of the Ohio Revised Code, and also the land disposal restriction regulations as set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, and 271.

As a result of the inspection, we have determine that the requirements of the land disposal restriction regulations are being violated.

1. The facility was shipping restricted waste without attendant or complete notifications, as required under 40 CFR Part 268.7. Under Part 268.7(a)(1), generators who manage restricted wastes which exceed treatment standards (reference 40 CFR Part 268, Subpart D - Treatment Standards) are required to provide a notification for each shipment of waste. The notification must contain the following information: EPA hazardous waste number; applicable treatment standard; manifest number; and waste analysis data, where available. The notification must be supplied to the treatment facility as a separate document accompanying the manifest. The inspector observed that your notifications did not contain the applicable treatment standards.

2. The inspector also observed that the facility's records did not contain copies of restricted waste notifications for your F006 waste. Under 40 CFR Part 268.7(a)(6), the facility must retain on-site a copy of all notifications produced pursuant to Part 268.7, for at least five (5) years from the date that the waste was last sent off-site. The facility is responsible for obtaining from the receiver of the waste a copy of all notifications sent pursuant to Part 268.7, for all applicable restricted waste shipments. These notifications and all subsequent ones must be kept on file at the generating facility.

Please include in your response to this NOV, an example of the notification you are supplying to the receiver of the waste and will keep on file at your facility.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violation has been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further enforcement action.

If you have any questions regarding this correspondence, please contact Ann Budich of my staff at (312) 353-6844.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA
Clifford Morton, CDO

bcc: Sally Swanson, REB

5HR-12 budich.walker 6-8093 diskette #5 filename: wil.1lg

10/5/90

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	alr 10-19-90	<i>[Signature]</i>	

IN DATE

DUNS: 16-125-2978
BORDEN INC
COLUMBUS COATED FABRICS
1280 N GRANT AVENUE
COLUMBUS OH 43201
TEL: 614 297-6000

DATE PRINTED
OCT 23 1990

RATING BRANCH

WHOL WALLPAPER
SIC NO.
51 98

EMPLOYS 600

BRANCH MANAGER: ROBERT BREWER

PAYMENTS (Amounts may be rounded to nearest figure in prescribed ranges)
REPORTED PAYING HIGH NOW PAST SELLING LAST SALE
RECORD CREDIT OWES DUE TERMS WITHIN
08/90 Ppt 1000 -0- -0- 6-12 Mos
This is a division: headquarters are located at 277 Park Avenue,
New York, NY. Headquarters D-U-N-S 00-133-8797. This division
wholesales wallpaper.
10-23(9AB /091) 026 162

FULL DISPLAY COMPLETE

RECEIVED
OCT 24 1990
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION 1

IN DATE

DUNS: 00-429-4351
BORDEN INC
COLUMBUS COATED FABRICS

DATE PRINTED
OCT 23 1990

RATING BRANCH

MFG COATED FABRICS
SIC NO.
22 95

EMPLOYS 800

BOX 208
COLUMBUS OH 43216
1280 N GRANT AVE
COLUMBUS OH 43201
TEL: 614 297-6000

BRANCH MANAGER: ROBERT A BREWER

PAYMENTS (Amounts may be rounded to nearest figure in prescribed ranges)						
REPORTED	PAYING RECORD	HIGH CREDIT	NOW OWES	PAST DUE	SELLING TERMS	LAST SALE WITHIN
10/90	Disc	20000	7500	-0-		2-3 Mos
	Ppt	100000	-0-	-0-		2-3 Mos
	Ppt	10000	10000	2500		1 Mo
	Ppt	5000	2500	-0-	1 10 N30	1 Mo
	Ppt	750	500	-0-	1 10 N30	1 Mo
	Ppt	500	-0-	-0-	N30	2-3 Mos
	Ppt-Slow 30	2500	750	-0-	N30	1 Mo
	Slow 5	2500	-0-	-0-	N30	6-12 Mos
09/90	Disc	1000	1000	-0-	1 10 N30	1 Mo
	Disc	500	250	-0-		1 Mo
	Ppt	30000	5000	-0-	Regular terms	1 Mo
	Ppt	7500	50	-0-	N7	1 Mo
	Ppt	5000	5000	-0-		1 Mo
	Ppt	2500	2500			1 Mo
	Ppt	2500	50	-0-	N7	1 Mo
	Ppt	1000	1000	-0-	N30	1 Mo
	Ppt	750	-0-	-0-	N30	2-3 Mos
	Ppt	500	50			1 Mo
	Ppt	500	-0-			1 Mo
	Ppt	500	-0-			6-12 Mos
	Ppt	500	-0-	-0-		6-12 Mos
	Ppt	500	-0-	-0-	N30	4-5 Mos
	Ppt	250	100	-0-		1 Mo
	Ppt	250	-0-	-0-	N30	2-3 Mos
	Ppt	250	-0-	-0-		6-12 Mos
	Ppt	100	100	-0-		1 Mo
	Ppt	100	-0-	-0-	N30	6-12 Mos
	Disc-Slow 15	10000	5000	250		1 Mo
	Ppt-Slow 30	2500	2500	750		1 Mo
	Ppt-Slow 30	2500	2500	750		1 Mo
	Ppt-Slow 30	500	500	100	N30	1 Mo
	Ppt-Slow 60	100	-0-	-0-	N30	1 Mo
	Ppt-Slow 90	250	250	250	N30	1 Mo
	Slow 5	500	50	-0-		1 Mo

08/90	Slow 90	7500	-0-	-0-	N30	4-5 Mos	
	Ppt	75000	-0-	-0-	N30	6-12 Mos	
	Ppt	25000	-0-	-0-	N30	1 Mo	
	Ppt	2500	-0-	-0-	1/2 10 N30	2-3 Mos	
	Ppt	2500	250	-0-	N30	1 Mo	
	Ppt	1000	100	100		6-12 Mos	
	Ppt	750	-0-	-0-	N15	2-3 Mos	
	Ppt	750	-0-		N30	4-5 Mos	
	Ppt	250	-0-	-0-	N30	6-12 Mos	
	Ppt	250	-0-	-0-	N30	2-3 Mos	
	Ppt	250	-0-	-0-	N15	6-12 Mos	
	Ppt	100	-0-	-0-	N15	6-12 Mos	
	Ppt	100	-0-	-0-	N30	6-12 Mos	
	Ppt	100	-0-	-0-	N15	2-3 Mos	
	Ppt-Slow 60	100	100	100	N30	2-3 Mos	
	Ppt-Slow 90	750	250	250	N30	1 Mo	
	07/90	Slow 5	55000	55000	-0-		1 Mo
Disc		20000	-0-	-0-		2-3 Mos	
Disc		10000	-0-	-0-	1 10 N30	6-12 Mos	
Ppt		2500	-0-	-0-	N30	6-12 Mos	
Ppt		2500	-0-	-0-	Regular terms	2-3 Mos	
Ppt		2500	2500	-0-	N30	1 Mo	
Ppt		2500	250	-0-	N15	1 Mo	
Ppt		750	-0-	-0-		6-12 Mos	
Ppt		750	100	-0-	N15	1 Mo	
Ppt		250	50	-0-	N15	1 Mo	
Ppt		250	-0-	-0-	N15	2-3 Mos	
Ppt		250	50	-0-		1 Mo	
Ppt-Slow 30		15000	5000	-0-	2 10 Prox	1 Mo	
Slow 5		5000	-0-	-0-	N30	2-3 Mos	
06/90		Ppt	10000	7500			1 Mo
		Ppt	2500				
		Ppt	2500			N30	
	Ppt	2500	-0-	-0-	N30	6-12 Mos	
	Ppt	500	-0-	-0-	N30	2-3 Mos	
	Ppt	250			N30		
	Ppt-Slow 15	900000	900000	-0-		1 Mo	
	Ppt-Slow 15	5000	-0-	-0-	N30	1 Mo	
	Ppt-Slow 30	7500	1000	-0-		1 Mo	
	Slow 5	50	50				
	Slow 30-60	2500	2500	750	N30	1 Mo	
	05/90	Ppt	5000	-0-	-0-	N30	2-3 Mos
		(077)			100		
		Placed for collection.					
	02/90	Slow 10	100	-0-	-0-	N30	6-12 Mos
		Slow 30	20000	-0-	-0-		6-12 Mos
	12/89	Slow 110	50	50	50	N30	

This is a division: headquarters are located at 277 Park Ave, New York, NY. Headquarters D-U-N-S 00-133-8797. The manager has authority to make all purchases. Bills are paid generally from this branch. This division manufactures coated fabric.

02/08/90 FACILITIES: Occupies premises in three story brick building in

normal condition.

LOCATION: Industrial section on main street.
10-23(9AB /074)

026 161

FULL DISPLAY COMPLETE

IN DATE

DUNS: 60-654-7677
E. DEN INC
+COLUMBUS COATED FABRICS

1432 N GRANT AVE
COLUMBUS OH 43201
TEL: 614 297-6000

DATE PRINTED
OCT 23 1990

RATING BRANCH
EMPLOYS UNDETERMINED

SIC NO.
22 95

BRANCH MANAGER: UNDETERMINED

This is a branch: headquarters are located at New York, NY.
Headquarters D-U-N-S 00-133-8797. This branch manufactures coated
fabrics.
10-23(6AO /015) 026 165

FULL DISPLAY COMPLETE

IN DATE

DUNS: 60-654-7511
DEN INC
COLUMBUS COATED FABRICS

1311 N GRANT AVED
COLUMBUS OH 43216
TEL: 614 297-6062

DATE PRINTED
OCT 23 1990

RATING BRANCH
EMPLOYS UNDETERMINED

SIC NO.
22 95

BRANCH MANAGER: UNDETERMINED

This is a branch: headquarters are located at New York, NY.
Headquarters D-U-N-S 00-133-8797. This branch manufacturers coated
fabrics.
10-23(6AO /015) 026 165

FULL DISPLAY COMPLETE

BE SURE NAME, BUSINESS AND ADDRESS MATCH YOUR FILE.

ANSWERING
INQUIRY

SUBSCRIBER: [REDACTED]

THIS REPORT MAY NOT BE REPRODUCED IN WHOLE OR IN PART IN ANY MANNER WHATEVER.

CONSOLIDATED REPORT

DUNS: 00-133-8797
BORDEN INC
(DIVISIONS-SEE OPERATION)

277 PARK AVE
AND BRANCH(ES) OR DIVISION(S)
NEW YORK NY 10172
TEL: 212 573-4000

DATE PRINTED
AUG 28 1990

PRODUCER &
MARKETER OF DAIRY
PRODUCTS, PACKAGED
FOODS, NON-FOOD
CONSUMER PRODUCTS
AND CHEMICAL
SPECIALITIES

SUMMARY
RATING 5A2

STARTED 1857
PAYMENTS SEE BELOW
SALES F \$7,593,417,000
WORTH F \$452,041,000
EMPLOYS 46,500 (20 HERE)
HISTORY BUSINESS
CONDITION GOOD

SIC NOS.
20 99 20 26 20 24
20 22 20 33

CHIEF EXECUTIVE: R J VENTRES, CHB-CEO

SPECIAL EVENTS

- 08/17/90 According to published reports, The Vermont Maple Orchards Inc of Essex Junction and its international owner agreed to pay the state \$150,000 for labeling bottles of Canadian maple syrup to appear as if they were made in Vermont.
- 08/02/90 According to published reports, subject announced that it has selected Chambersburg, Pennsylvania, as the site for a new "hyperplant" a large, state-of-the-art and highly efficient facility with low cost production economics.
- 08/01/90 According to published reports, comparative operating results for the 6 months ended June 30, 1990 are as follows: sales of \$3,795,334,000 and net income (loss) of \$153,534,000 compared to sales of \$3,707,188,000 and net income (loss) of \$142,983,000 for the comparable period in the prior year.
- 06/26/90 According to published reports, the Sherwin-Williams Company has completed the purchase of the Krylon(R) aerosol paints and coatings business of Borden Inc. The acquisition includes selected assets of the aerosol paints and coatings business of Illinois Bronze Paint Company, the manufacturer of ColorWorks(R) and other aerosol paints. The acquisition does not include the hobby/craft segment of Illinois Bronze.
- 06/19/90 According to published reports, subject announced the acquisition from Richdale, Ltd of the Quinlan Pretzel Company, a privately owned pretzel manufacturer. Terms of the acquisition were not disclosed.
- 05/31/90 According to published reports, Anthony S D'Amato has been elected president and chief operating officer of subject effective July 1 1990. The appointment was announced by R J Ventres, who continues as chairman and chief executive officer. D'Amato was also elected to the board of directors.
- 05/25/90 According to published reports, subject plans to move its Brundidge, AL plant to Hawkins Field Industrial Park, Jackson, MS., with operations expected to begin there by the end of 1990.
- 05/21/90 According to a published report, the Company said it acquired a Canadian pasta and pasta sauce business (Gattuso) from Campbell Soup Company; and a producer of foils and papers for laminates (Letron Inc). Terms were not disclosed.

PAYMENTS REPORTED	(Amounts may be rounded to nearest figure in prescribed ranges)	PAYING RECORD	HIGH CREDIT	NOW OWES	PAST DUE	SELLING TERMS	LAST SALE WITHIN
9/90	Disc		2500	-0-	-0-	2 10 EOM	2-3 Mos
	Disc		2500	250	-0-		1 Mo
	Disc		1000	1000	-0-		1 Mo
	Disc		1000	250	-0-		1 Mo
	Disc		1000	-0-	-0-		6-12 Mos
	Disc-Ppt		200000	100000	-0-	1 10 N30	1 Mo

SEE REVERSE SIDE FOR GLOSSARY OF TERMS

(CONTINUED)

BORDEN INC
NEW YORK NY

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CONSOLIDATED REPORT

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PAYMENTS
(Cont'd)

Ppt	100000	45000	1000	1 10 N30	1 Mo
Ppt	75000	-0-	-0-	N30	6-12 Mos
Ppt	50000	40000	-0-		
Ppt	45000	45000	-0-	1 10 N30	1 Mo
Ppt	40000	-0-	-0-		4-5 Mos
Ppt	30000	-0-	-0-	N30	4-5 Mos
Ppt	25000	-0-	-0-	1 10 N30	4-5 Mos
Ppt	20000	-0-	-0-		6-12 Mos
Ppt	15000	-0-	-0-		4-5 Mos
Ppt	15000	10000	-0-		1 Mo
Ppt	7500	7500	-0-		1 Mo
Ppt	7500	-0-	-0-		2-3 Mos
Ppt	5000	750	-0-		1 Mo
Ppt	5000	50	-0-		1 Mo
Ppt	5000				
Ppt	5000	-0-	-0-	N30	6-12 Mos
Ppt	2500	500	-0-		1 Mo
Ppt	2500	2500	500		1 Mo
Ppt	2500	1000	-0-		1 Mo
Ppt	2500	-0-	-0-		6-12 Mos
Ppt	2500	-0-	-0-		6-12 Mos
Ppt	2500	-0-	-0-		2-3 Mos
Ppt	2500	2500	-0-		1 Mo
Ppt	1000				
Ppt	1000	-0-	-0-		2-3 Mos
Ppt	1000	-0-	-0-		1 Mo
Ppt	1000	-0-	-0-		2-3 Mos
Ppt	1000	-0-	-0-	Regular terms	6-12 Mos
Ppt	1000	-0-	-0-		6-12 Mos
Ppt	1000	100	-0-	N30	1 Mo
Ppt	750	250	-0-	N30	1 Mo
Ppt	750	750	-0-		2-3 Mos
Ppt	750	-0-	-0-		2-3 Mos
Ppt	750	750	-0-		1 Mo
Ppt	750	750	-0-	N30	1 Mo
Ppt	750	750	-0-		1 Mo
Ppt	500	-0-	-0-	N30	6-12 Mos
Ppt	500	-0-	-0-		2-3 Mos
Ppt	500	250	-0-		1 Mo
Ppt	500	-0-	-0-		4-5 Mos
Ppt	500	-0-	-0-		6-12 Mos
Ppt	500	500	-0-		1 Mo
Ppt	250	-0-	-0-		4-5 Mos
Ppt	250	-0-	-0-		6-12 Mos
Ppt	100	50	50		1 Mo
Ppt-Slow 15	25000	-0-	-0-		6-12 Mos
Ppt-Slow 15	500	250	-0-		1 Mo
Ppt-Slow 30	15000	1000	-0-		1 Mo
Ppt-Slow 30	7500	7500	100	2 10 Prox	1 Mo
Ppt-Slow 30	5000	-0-	-0-	N30	6-12 Mos
Ppt-Slow 30	2500	250	250	N30	1 Mo
Ppt-Slow 30	2500	-0-	-0-		6-12 Mos
Ppt-Slow 30	750	250	-0-		1 Mo
Ppt-Slow 30	250	100	100		1 Mo
Ppt-Slow 60	60000	55000	7500	1 10 N30	1 Mo
Ppt-Slow 60	40000	10000	1000	N30	1 Mo
Ppt-Slow 60	1000	750	750		2-3 Mos
Ppt-Slow 60	750	-0-	-0-		4-5 Mos
Ppt-Slow 90	7500	-0-	-0-		6-12 Mos
Ppt-Slow 120	2500	2500	1000	N30	1 Mo
Slow 5	2500	-0-	-0-		2-3 Mos
Slow 10	1000				
Slow 30	15000	-0-	-0-		6-12 Mos
Slow 30	7500	250	250		1 Mo
Slow 30	5000	-0-	-0-	2 10 N30	1 Mo
Slow 30	250	250	250		1 Mo
Slow 55	1000				

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BORDEN INC
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PAYMENTS
(Cont'd)

07/90	Slow 30-60	200000	25000	25000		2-3 Mos
	Slow 60	30000	-0-	-0-	N30	6-12 Mos
	Slow 15-70	750	-0-	-0-		4-5 Mos
	Ppt	500000	55000	55000		2-3 Mos
	Ppt	15000	-0-	-0-		2-3 Mos
	Ppt-Slow 15	100000	25000	-0-	N15	1 Mo
	Slow 15	50000	-0-	-0-		4-5 Mos

* Payment experiences reflect how bills are met in relation to the terms granted. In some instances payment beyond terms can be the result of disputes over merchandise, skipped invoices etc.

* Each experience shown represents a separate account reported by a supplier. Updated trade experiences replace those previously reported.

UPDATE

08/20/90 On Aug 16 1990, management, submitted the following statement dated Mar 31 1990.

STATEMENT UPDATE

08/20/90 Interim Consolidated statement dated MAR 31 1990:

Cash	\$ 127,976,000	Accounts &	\$
Accts Rec	931,753,000	Drafts Payable	580,464,000
Inventory	647,745,000	Taxes	83,017,000
Other Curr Assets	311,085,000	L.T. Liab-(1yr)	371,995,000
		Reconfiguration	
		Reserve	126,523,000
		Other Curr Liabs	391,119,000
Curr Assets	2,018,559,000	Curr Liabs	1,553,118,000
Fixt & Equip	1,433,695,000	Long Term Debt	1,419,406,000
Invest In &		Deferred Income	
Advances To		Taxes	187,192,000
Affiliates	74,452,000	L.T. Liab-Other	19,975,000
Intangibles	1,216,094,000	PREFERRED STOCK	33,000
Other Assets	105,026,000	COMMON STOCK	126,240,000
		ADDIT. PD.-IN CAP	308,962,000
		TRANSLATION	
		ADJUSTMENT	(59,909,000)
		RETAINED EARNINGS	1,814,251,000
		TREASURY STOCK	(521,442,000)

Total Assets 4,847,826,000 Total 4,847,826,000
From JAN 01 1990 to MAR 31 1990 sales \$1,892,451,000; cost of goods sold \$1,398,001,000. Gross profit \$494,450,000; operating expenses \$343,819,000. Operating income \$150,631,000; other income \$5,622,000; other expenses \$57,556,000; net income before taxes \$98,697,000; Federal income tax \$35,600,000; net income \$63,097,000.

Prepared from statement(s) by Accountant: Accountant not indicated. Extent of audit, if any, not indicated.

--0--

Item worth shown in summary section was computed after deduction of intangibles, totaling \$1,216,094,000. Accounts receivable shown net less \$13,584,000 allowance. Fixed assets shown net less \$1,288,790,000 depreciation.

FINANCE

A CONSULTING SERVICE IS AVAILABLE TO ASSIST YOU IN REVIEWING THIS ACCOUNT FURTHER. PLEASE CALL (800) 223 - 0141 TO SPEAK WITH A DUNS ACCOUNT CONSULTANT.

05/10/90

	Fiscal Consolidated Dec 31 1987	Fiscal Consolidated Dec 31 1988	Fiscal Consolidated Dec 31 1989
Curr Assets	1,868,958,000	1,814,323,000	2,011,394,000
Curr Liabs	1,147,117,000	1,222,612,000	1,539,379,000
Current Ratio	1.63	1.48	1.31
Working Capital	721,841,000	591,711,000	472,015,000
Other Assets	1,391,324,000	1,532,699,000	1,600,760,000
Noncurrent Liabs	1,351,397,000	1,369,099,000	1,640,102,000
Worth	761,768,000	755,311,000	432,673,000
Sales	6,514,422,000	7,243,526,000	7,593,417,000

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BORDEN INC
NEW YORK NY

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CONSOLIDATED REPORT

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FINANCE

(Cont'd)

Net Income (loss)	267,056,000	311,882,000	(60,552,000)
Deprec & Amort	159,147,000	172,870,000	186,025,000
Interest Expense	119,643,000	146,604,000	160,241,000
Capital Expenditures	201,773,000	232,640,000	243,960,000
Funds Prov By Opns	318,945,000	120,413,000	211,953,000
Fiscal Consolidated statement dated DEC 31 1989:			
Cash	\$ 103,922,000	Accts Pay	\$ 609,042,000
Accts Rec	943,028,000	Commercial Paper	35,000,000
Inventory	664,021,000	Taxes	86,807,000
Other Curr Assets	300,423,000	L.T. Liab-(1yr)	70,491,000
		Foreign Bank	
		Loans	200,917,000
		Reconfiguration	
		Reserve	192,522,000
		Other Curr Liabs	344,600,000
Curr Assets	2,011,394,000	Curr Liabs	1,539,379,000
Fixt & Equip	1,441,476,000	Long-term Debt	1,440,563,000
Investments & Advances-		Deferred Income	
affiliates	49,835,000	Taxes	180,160,000
Goodwill	1,212,742,000	L.T. Liab-Other	19,379,000
Other Assets	109,449,000	PREFERRED STOCK	34,000
		COMMON STOCK	126,240,000
		ADDIT. PD.-IN CAP	307,720,000
		TREASURY STOCK	(515,468,000)
		RETAINED EARNINGS	1,786,599,000
		TRANSLATION	
		ADJUSTMENT	(59,710,000)

Total Assets 4,824,896,000 Total 4,824,896,000
 From JAN 01 1989 to DEC 31 1989 sales \$7,593,417,000; cost of goods sold \$5,671,676,000. Gross profit \$1,921,741,000; operating expenses \$1,205,502,000. Operating income \$716,239,000; other expenses \$160,241,000; net income before taxes \$555,998,000. (net loss) \$60,552,000. Reconfiguration charge \$570,678,000. Equity-income of affiliates \$(16,966,000). Other income \$(262,000). Income taxes \$63,100,000. Net worth at start \$755,311,000. Incr-intangibles (119,438,000). Other additions \$18,404,000; net loss \$60,552,000; dividends \$133,090,000; other deductions \$27,962,000; net worth at end \$432,673,000.

Prepared from statement(s) by Accountant: Price Waterhouse.

ACCOUNTANTS OPINION: "A review of the accountant's opinion indicates the financial statements meet generally accepted accounting principles and that the audit contains no qualifications".

--0--

Item worth shown in summary section was computed after deduction of intangibles, goodwill, totaling \$1,212,742,000. Accounts receivable shown net \$13,584,000 allowance. Fixed assets shown net \$1,290,106,000 depreciation.

-----BALANCE SHEET EXPLANATIONS (000's omitted)-----

LONG-TERM DEBT (excluding current maturities):

10 5/8% Canadian \$ notes due 1993 \$ 47,686.

16 1/2% Australian \$ notes due 1994 116,385.

10 1/4% notes due 1995 \$100,000.

9 7/8% notes due 1997 125,000.

Medium term notes 7.8-7.5% 245,000.

Sink fund deb 8 3/8 & 9 1/4% (2016-19) 290,000.

Commercial paper 9.2 & 7.6% 300,000.

Indust rev bonds 8.5 & 8.3% 73,945.

Other 9.9 & 9.5% 142,547.

Medium term note, commercial paper, industrial revenue bond and other debt obligation interest rates are stated at average.

Aggregate annual maturities 1990-95 and after: \$70,491; \$67,357; \$46,938; \$86,971; \$179,210; and \$1,060,087.

CREDIT FACILITIES: According to the its annual report of Dec 31 1989, the Company has a \$300 million revolving credit facility for the issuance of short-term notes and credit agreements of approximately \$273 million under which it can execute

(CONTINUED)

BORDEN INC
NEW YORK NY

AUG 28 1990

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FINANCE

(Cont'd) term loans for up to two years. Additional unused credit facilities of approximately \$254.1 million are available to foreign subsidiaries.

LEASES: Minimum rentals on operating leases 1990-95 and after, \$264,495.

LONG-TERM LIABILITIES-OTHER: Includes minority interests in consolidated subsidiaries, \$3,202.

CONTINGENT LIABILITIES: Consist of litigation which, in the opinion of management, will not have a material adverse impact on the Company's financial position.

-----INCOME STATEMENT EXPLANATIONS-----

OTHER EXPENSES: Consist of interest expense.

-----NET WORTH RECONCILIATION-----

OTHER ADDITIONS: Consist of stock transactions.

OTHER DEDUCTIONS: Consist principally of treasury stock purchases and translation adjustments.

-----WORKING CAPITAL RECONCILIATION (000's omitted).-----

Balance Dec 31 1988 \$591,711; increase fixed assets (\$53,544); increase other noncurrent assets (\$14,517); increase long-term debt \$280,423; decrease other long-term liabilities (\$9,420); decrease tangible net worth (\$322,638). Balance Dec 31 1989 \$472,015; net decrease in working capital, \$119,696.

-----INTERIM UPDATE-----

On MAR 06 1990 management, submitted the above figures.

Management also submitted the following interim figures dated MAR 31 1990: Sales for the 3 months ended Mar 31 1990 were \$1,892,451. Profits for the period were \$63,097,000.

Sales for the 3 months ended Mar 31 1990 were up 4.1% compared to the same period last year. Profit for the period was up 6.9%.

Management reported strong results in grocery and specialty products more than offsetting lower profit in snacks and international products during the first quarter of 1990.

-----OPERATING TRENDS-----

	1988	1989.
Sales % increase	11.2	4.8.
Gross Margin % sales	25.6	25.3.
Operating Expense % sales	16.5	15.9.
Net Income % sales	4.3	----

The Company's consolidated sales have continued to increase through 1988 and 1989 as a result of sales increases achieved by grocery & specialty products, snacks & international consumer products, and packaging & industrial products segments principally through acquisitions, higher pasta product sales, increased foreign sales, the introduction of new products, strong merchandising, and improved pricing.

Dairy business sales decreased in 1988 as a result of a decline in selling price partially offset by slightly higher volume, and in 1989 as a result of lower volume partially offset by price increases.

Operating profit for grocery & specialty products and snacks & international consumer products businesses increased in correlation with increased sales offset by decreases in the dairy business due to higher raw milk costs and intense competition, and a reduced interest in Borden Chemicals and Plastics Limited Partnership from 25% in 1988 to 2% in 1989.

Net income 1989 was impacted on by a one-time pretax charge of \$570.7 million for a reserve to cover the cost of a corporate wide reconfiguration and restructuring program, increased interest expense and decreased equity income from affiliates, partially offset by decreased income taxes.

-----SELECTED FINANCIAL RATIOS-----

	1988	1989.
Quick	0.82	0.68.
Collection Period (days)	43.9	44.7.
Inventory Turnover (times)	8.2	8.5.
Curr Liabs/Tang Net Worth (%)	161.9	355.8.
Tot Liabs/Tang Net Worth (%)	343.1	734.8.

-----ANALYST'S COMMENTS-----

The Company continues an established record of sales growth with profitable operations through fiscal 1988. Working capital was decreased in 1989 and at year end, liquidity was reduced slightly with cash, cash equivalents and receivables representing 68% of current liabilities, down from 82% a year earlier. Trade receivables and inventories continued to turn at active rates; and cash flow generated from operations was increased, despite a net loss, principally as a result of the Company's reconfiguration charge of \$401,394 for the year.

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BORDEN INC
NEW YORK NY

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CONSOLIDATED REPORT

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FINANCE
(Cont'd)

At Dec 31 1989, the Company's tangible net worth was reduced significantly in proportion to both current and total liabilities primarily as a result of a net loss for the period (due to the recognition of the one-time reserve charge for reconfiguration and restructuring programs) in combination with dividends paid, an increase in intangibles incurred in association with business acquisitions, and treasury stock purchases.

In Sep 1989, the Company announced its plans to streamline and consolidate its businesses; and restructure its dairy business by exiting overcrowded, non-growth markets in the Midwest and East and concentrate on its strongest dairy growth areas in the South and West.

Under its dairy restructuring, the Company will sell or close 65 of its 265 plants world-wide within three years; and will reduce its work force by 7,000, or 15%. Of those plants, 45 produce food or consumer goods and 20 are dairy facilities.

With these programs in place, the Company intends to streamline its plants for major production economies and apply added margin to increase advertising and marketing support for its brands. The growth strategy is expected to keep the Company on its five year target of a 15% annual average increase in net income.

Later, in Oct 1989, the Company announced its plans to sell 14 dairy plants in 10 states. Plants intended for sale are located in Dayton, Youngstown and New Bremen, OH; Miami, Pensacola and Tampa, FL; Albany, NY; Albuquerque, NM; Detroit, MI; High Point, NC; Indianapolis, IN; Lexington, KY; Macon, GA; and Milwaukee, WI.

PUBLIC FILINGS

The following data is for information purposes only and is not the official record. Certified copies can only be obtained from the official source.

* * * SUIT(S) * * *

DOCKET NO.: 90-12103
PLAINTIFF: NORTHERN PLUMBING & HEATING INC
WHERE FILED: HENNEPIN COUNTY DISTRICT COURT,
MINNEAPOLIS, MN
STATUS: Pending
DATE STATUS ATTAINED: 07/11/1990
DATE FILED: 07/11/1990
LATEST DATA RECEIVED: 07/26/1990

* * * LIEN(S) * * *

DOCKET NO.: 90386331
AMOUNT: \$2,632 STATE INCOME TAX
TYPE: State Tax
WHERE FILED: COOK COUNTY RECORDER OF DEEDS,
CHICAGO, IL
STATUS: Open
DATE FILED: 08/09/1990
LATEST DATA COLLECTED: 08/09/1990

DOCKET NO.: R90-94303
AMOUNT: \$2,632 STATE INCOME TAX
TYPE: State Tax
FILED BY: ILLINOIS, STATE OF, SPRINGFIELD,
IL
WHERE FILED: COOK COUNTY RECORDER OF DEEDS,
CHICAGO, IL
STATUS: Open
DATE FILED: 07/30/1990
LATEST DATA COLLECTED: 07/30/1990

* * * UCC FILING(S) * * *

COLLATERAL: Specified Industrial equipment/machinery and proceeds
FILING NO: 152918
TYPE: Original
SEC. PARTY: CATERPILLAR FINANCIAL SERVICES
CORPORATION, SMYRNA, GA
DATE FILED: 07/17/1990
LATEST DATA RECEIVED: 08/10/1990
FILED WITH: SECRETARY OF
STATE/UCC DIVISION,
NY

COLLATERAL: Specified Equipment and proceeds - Specified Accounts receivable
and proceeds
FILING NO: 900132249
TYPE: Original
SEC. PARTY: SWENSEN'S ICE CREAM COMPANY,
ANDOVER, MA
DATE FILED: 01/31/1990
LATEST DATA RECEIVED: 04/13/1990
FILED WITH: SECRETARY OF THE
COMMONWEALTH/UCC

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FILINGS

(Cont'd) DEBTOR: MEADOWGOLD, ROANOKE, VA DIVISION, VA

COLLATERAL: Specified Industrial equipment/machinery and proceeds
 FILING NO: 90004246 DATE FILED: 01/24/1990
 TYPE: Original LATEST DATA RECEIVED: 04/16/1990
 SEC. PARTY: SPARTAN LEASING CO INC, FILED WITH: SECRETARY OF
 SPARTANBURG, SC STATE/UCC DIVISION,
 ASSIGNEE: EATON CREDIT CORP, CLEVELAND, OH SC
 DEBTOR: BORDEN SNACKS DIVISION TA BORDEN
 INC, SPARTANBURG, SC

COLLATERAL: Specified Industrial equipment/machinery and proceeds - Specified
 Equipment and proceeds
 FILING NO: 307290 DATE FILED: 12/26/1989
 TYPE: Original LATEST DATA RECEIVED: 03/09/1990
 SEC. PARTY: CATERPILLAR FINANCIAL SERVICES FILED WITH: SECRETARY OF
 CORP, SMYRNA, GA STATE/UCC DIVISION,
 NY

COLLATERAL: Leased Equipment and proceeds
 FILING NO: 250499 DATE FILED: 06/21/1990
 TYPE: Original LATEST DATA RECEIVED: 07/10/1990
 SEC. PARTY: ENCORE INTERNATIONAL INC, FILED WITH: OFFICE OF THE LT
 BLOOMFIELD HILLS, MI GOVERNOR/DEPARTMENT
 ASSIGNEE: SANWA BUSINESS CREDIT CORP, OF COMMERCE/UCC
 CHICAGO, IL DIVISION, UT
 DEBTOR: BORDEN INC, COLUMBUS, OH

COLLATERAL: Leased Industrial equipment/machinery and proceeds
 FILING NO: 90065705 DATE FILED: 03/26/1990
 TYPE: Original LATEST DATA RECEIVED: 05/03/1990
 SEC. PARTY: CLARKLIFT OF EL PASO INC, EL FILED WITH: SECRETARY OF
 PASO, TX STATE/UCC DIVISION,
 DEBTOR: BORDEN INC, EL PASO, TX TX

COLLATERAL: Leased Equipment and proceeds - Leased Business machinery/equipment
 and proceeds
 FILING NO: 18090145 DATE FILED: 01/09/1990
 TYPE: Original LATEST DATA RECEIVED: 03/01/1990
 SEC. PARTY: CMI CORP, BLOOMFIELD HILLS, MI FILED WITH: SECRETARY OF
 DEBTOR: BORDEN INC, COLUMBUS, OH STATE/UCC DIVISION,
 PA

COLLATERAL: Leased Business machinery/equipment including proceeds and products
 FILING NO: 1100142 DATE FILED: 12/18/1989
 TYPE: Original LATEST DATA RECEIVED: 02/01/1990
 SEC. PARTY: ENCORE INTERNATIONAL INC, FILED WITH: SECRETARY OF
 BLOOMFIELD HILLS, MI STATE/UCC DIVISION,
 ASSIGNEE: NATIONWIDE LIFE INSURANCE WI
 COMPANY (INC), COLUMBUS, OH
 DEBTOR: BORDEN INC, COLUMBUS, OH

COLLATERAL: Specified Equipment
 FILING NO: 250498 DATE FILED: 06/21/1990
 TYPE: Original LATEST DATA RECEIVED: 07/10/1990
 SEC. PARTY: ENCORE INTERNATIONAL INC, FILED WITH: OFFICE OF THE LT
 BLOOMFIELD HILLS, MI GOVERNOR/DEPARTMENT
 ASSIGNEE: SANWA BUSINESS CREDIT CORP, OF COMMERCE/UCC
 CHICAGO, IL DIVISION, UT
 DEBTOR: BORDEN INC, COLUMBUS, OH

COLLATERAL: Specified Equipment
 FILING NO: 90064357 DATE FILED: 03/23/1990
 TYPE: Original LATEST DATA RECEIVED: 05/03/1990
 SEC. PARTY: MCDONNELL DOUGLAS CAPITAL CORP, FILED WITH: SECRETARY OF
 TROY, MI STATE/UCC DIVISION,

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FILINGS

(Cont'd) DEBTOR:	BORDEN INC, COLUMBUS, OH	TX
<hr/>		
COLLATERAL:	Leased Equipment	
FILING NO:	0486173	DATE FILED: 06/25/1990
TYPE:	Original	LATEST DATA RECEIVED: 07/06/1990
SEC. PARTY:	ENCORE INTERNATIONAL INC, BLOOMFIELD HILLS, MI	FILED WITH: SECRETARY OF STATE/UCC DIVISION, MS
ASSIGNEE:	SANWA BUSINESS CREDIT CORPORATION, CHICAGO, IL	
DEBTOR:	BORDEN INC, COLUMBUS, OH	
<hr/>		
COLLATERAL:	Leased Equipment - Leased Computer equipment	
FILING NO:	033128	DATE FILED: 06/20/1990
TYPE:	Original	LATEST DATA RECEIVED: 07/06/1990
SEC. PARTY:	ENCORE INTERNATIONAL INC, BLOOMFIELD HILLS, MI	FILED WITH: OKLAHOMA CENTRAL FILING OFFICE/UCC DIVISION, OK
ASSIGNEE:	SANWA BUSINESS CREDIT CORP, CHICAGO, IL	
DEBTOR:	BORDEN INC, COLUMBUS, OH	
<hr/>		
COLLATERAL:	Leased Computer equipment	
FILING NO:	AB0099947	DATE FILED: 06/19/1990
TYPE:	Original	LATEST DATA RECEIVED: 07/30/1990
SEC. PARTY:	AT&T SYSTEMS LEASING CORPORATION BLOOMFIELD HILLS, MI	FILED WITH: SECRETARY OF STATE/UCC DIVISION, OH
ASSIGNEE:	SANWA BUSINESS CREDIT CORPORATION (DEL), CHICAGO, IL	
DEBTOR:	BORDEN INC, COLUMBUS, OH	
<hr/>		
COLLATERAL:	Leased Equipment	
FILING NO:	AB0099942	DATE FILED: 06/19/1990
TYPE:	Original	LATEST DATA RECEIVED: 07/30/1990
SEC. PARTY:	AT&T SYSTEMS LEASING CORPORATION BLOOMFIELD HILLS, MI	FILED WITH: SECRETARY OF STATE/UCC DIVISION, OH
ASSIGNEE:	SANWA BUSINESS CREDIT CORPORATION (DEL), CHICAGO, IL	
DEBTOR:	BORDEN INC, COLUMBUS, OH	
<hr/>		
COLLATERAL:	Leased Equipment - Leased Communications equipment	
FILING NO:	90132562	DATE FILED: 06/19/1990
TYPE:	Original	LATEST DATA RECEIVED: 07/12/1990
SEC. PARTY:	ENCORE INTERNATIONAL INC, BLOOMFIELD HILLS, MI	FILED WITH: SECRETARY OF STATE/UCC DIVISION, TX
ASSIGNEE:	SANWA BUSINESS CREDIT CORP, CHICAGO, IL	
DEBTOR:	BORDEN INC, COLUMBUS, OH	
<hr/>		
COLLATERAL:	Leased Equipment	
FILING NO:	90132563	DATE FILED: 06/19/1990
TYPE:	Original	LATEST DATA RECEIVED: 07/12/1990
SEC. PARTY:	ENCORE INTERNATIONAL INC, BLOOMFIELD HILLS, MI	FILED WITH: SECRETARY OF STATE/UCC DIVISION, TX
ASSIGNEE:	SANWA BUSINESS CREDIT CORP, CHICAGO, IL	
DEBTOR:	BORDEN INC, COLUMBUS, OH	
<hr/>		
COLLATERAL:	Leased Equipment	
FILING NO:	2727961	DATE FILED: 06/14/1990
TYPE:	Original	LATEST DATA RECEIVED: 06/18/1990
SEC. PARTY:	ENCORE INTERNATIONAL INC, BLOOMFIELD HILLS, MI	FILED WITH: SECRETARY OF STATE/UCC DIVISION, IL
ASSIGNEE:	SANWA BUSINESS CREDIT CORP, CHICAGO, IL	
DEBTOR:	BORDEN INC, COLUMBUS, OH	
<hr/>		
COLLATERAL:	Leased Equipment	

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FILINGS

(Cont'd) FILING NO: 123494 DATE FILED: 06/11/1990
 TYPE: Original LATEST DATA RECEIVED: 07/27/1990
 SEC. PARTY: LIFTECH HANDLING (INC), SYRACUSE NY FILED WITH: SECRETARY OF
 DEBTOR: BORDEN INC, SYRACUSE, NY STATE/UCC DIVISION,
 NY

COLLATERAL: Leased Equipment
 FILING NO: 1856999 DATE FILED: 04/13/1990
 TYPE: Original LATEST DATA RECEIVED: 04/26/1990
 SEC. PARTY: ENCORE INTERNATIONAL INC, BLOOMFIELD HILLS, MI FILED WITH: SECRETARY OF
 DEBTOR: BORDEN INC, COLUMBUS, OH STATE/UCC DIVISION,
 MO

COLLATERAL: Leased Communications equipment - Leased Equipment - Leased
 Computer equipment
 FILING NO: 902029505 DATE FILED: 04/13/1990
 TYPE: Original LATEST DATA RECEIVED: 05/25/1990
 SEC. PARTY: ENCORE INTL INC, BLOOMFIELD HILLS, MI FILED WITH: SECRETARY OF
 ASSIGNEE: SANWA BUS CR CORP, CHICAGO, IL STATE/UCC DIVISION,
 DEBTOR: BORDEN INC, COLUMBUS, OH CO

There are additional public filings in D&B's file on this company available by contacting 1-800-DNB-DIAL.

The public record items reported above under "PUBLIC FILINGS" and "UCC FILINGS" may have been paid, terminated, vacated or released prior to the date this report was printed.

BANKING

07/90 Account(s) averages low 5 figures.
 06/90 Account(s) averages medium 4 figures. Account open over 3 years.
 05/90 Account open over 5 years. Overall relations are satisfactory.
 08/89 Account open 1-3 years.
 (Same bank) Account(s) averages low 6 figures. Account open 1-3 years.

HISTORY

05/10/90

R J VENTRES, CHB-CEO+ RICHARD FOWLKES, EX V PRES
 JON G HETTINGER, EX V PRES GEORGE J WAYDO, EX V PRES
 A S D'AMATO, EX V PRES DAVID A KELLY, V PRES-TREAS
 WALTER W KOCHER, V PRES-GEN LAWRENCE O DOZA, SR V PRES-CFO
 COUNSEL
 ALLAN L MILLER, SR V PRES-CAO JAMES M HESS, V PRES-GEN CONTR
 ROBERT G TRITSCH, SEC
 DIRECTOR(S): The officers identified by (+) and Theodore Cooper MD,
 Virginia Dwyer, Wilbert J LeMelle, Robert P Luciano, John W Lynn,
 Robert T Quittmeyer, Patricia Carry Stewart, Eugene J Sullivan, Frank
 J Tasco and Pieter C Vink.

Incorporated New Jersey Apr 24 1899. Authorized capital consists of 480,000,000 shares common stock, \$0.625 par value.

Also authorized are 10,000,000 shares preferred stock, no par value.

-----BACKGROUND/OWNERSHIP-----

OUTSTANDING CAPITAL STOCK (DEC 31 1989): 201,983,374 shares common; 54,027,019 shares common in treasury at cost; and 8,147 shares preferred.

Name changed from Borden's Condensed Milk Company to Borden Company Oct 1919 and to Borden Inc Apr 19 1968.

Business started 1857 by Gail Borden. The Company's common stock is traded on the New York Stock Exchange (ticker symbol, "BN") and exchanges in Basel, Geneva, lausanne and Zurich, Switzerland, and Tokyo, Japan. At Dec 31 1989 there were 39,098 common shareholders of record.

At Feb 20 1990, the officers and directors as a group held 1.0% of the Company's outstanding common stock with the balance is held by the general public.

-----RECENT EVENTS-----

In Apr 1990, the Company acquired the flexible packaging business of Printpac-UEB

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HISTORY

(Cont'd) of New Zealand and Abbott/Polyaustro Group, an Australian manufacturer of polyethylene film and flexible packaging, for undisclosed considerations.

In Jan 1990, the Company completed the sale of its U S Butter Group to Societe de Diffusion Internationale Agro-Alimentaire (Sodiaal), Paris, France for an undisclosed amount of cash.

Also in Jan 1990, the Company agreed to sell its Krylon aerosol paints and coatings business to The Sherwin-Williams Company for an undisclosed consideration.

In Dec 1989, the Company sold its Meadow Gold dairy plant in New Bremen, OH to Milk Marketing, Inc, Strongsville, OH for an undisclosed consideration.

-----RECONFIGURATION/RESTRUCTURING-----

In Sep 1989, the Company announced its plans to streamline and consolidate its businesses; and restructure its dairy business by exiting overcrowded, non-growth markets in the Midwest and East and concentrate on its strongest dairy growth areas in the South and West.

Under its dairy restructuring, the Company sell or close 65 of its 265 plants world-wide within three years; and will reduce its work force by 7,000, or 15%. Of those plants, 45 produce food or consumer goods and 20 are dairy facilities.

With these programs in place, the Company intends to streamline its plants for major production economies and apply added margin to increase advertising and marketing support for its brands. The growth strategy is expected to keep the Company on its five year target of a 15% annual average increase in net income.

Later, in Oct 1989, the Company announced its plans to sell 14 dairy plants in 10 states. Plants intended for sale are located in Dayton, Youngstown and New Bremen, OH; Miami, Pensacola and Tampa, FL; Albany, NY; Albuquerque, NM; Detroit, MI; High Point, NC; Indianapolis, IN; Lexington, KY; Macon, GA; and Milwaukee, WI.

-----ACQUISITIONS-----

During 1989, the Company acquired 15 operations for a total of \$296.8 million, including assumed debt. the acquisitions included a pasta and pasta sauce operation, an industrial food service operation, two West German bakeries, a maple syrup operation, a dehydrated soup operation, a sterile chocolate milk operation, a snacks operation, two dairy operations, an aerosol and craft paint operation, a wallpaper manufacturer, a plastic films and rigid packaging operation, and two industrial products businesses. During 1989, the Company disposed of 5 operations for approximately \$124.3 million in cash.

During 1988, the Company acquired 24 operations for a total cost of approximately \$379.9 million; and disposed of 7 operations for approximately \$222.0 million in cash.

During 1987, the Company acquired 23 operations for a total cost of approximately \$442.6 million; and disposed of 6 operations for approximately \$473.0 million in cash.

-----MANAGEMENT BACKGROUND-----

VENTRES, born 1924 married. Worcester Polytechnic Institute. Years to 1955 Atlantic Refining Co. 1955-1957 Middle East Refiners. 1957-1974 Borden Inc. 1974-1979 Haven Industries Inc, Ex V Pres. 1979-present Borden Inc, 1979 Group V Pres-Chemicals, 1983 Pres-Chemicals and Corporate Ex V Pres; Jul 1985 Pres-Chief Operating Officer-Dir; Nov 1986 Chief Executive Officer; Feb 1987 Chairman.

FOWLKES, born 1934 married. 1955-present Borden Inc, various positions, 1982 V Pres and Southeast Regional Manager; 1985 Group V Pres-Southeast Region; 1987 Senior Group V Pres-Dairy Operations; Jul 1988 Ex V Pres and Pres, Dairy Div.

HETTINGER, born 1941 married. 1964 Western Michigan University, BS degree. 1972-present Borden Inc; 1972 Marketing Manager, Milk Products Foods Div; 1973-Dir Marketing, Beverage Products Foods Div; 1975 Pres-Beverage Products Foods Div; 1977 Pres-Wyler Foods/Borden Foods Div; 1978 Group V Pres, Grocery Products Borden Consumer Products; 1984 Senior Group V Pres, Grocery and Specialty Products Borden Consumer Products; Jan 1985 Corporate V Pres and Senior Group V Pres, Grocery and Specialty Products; Oct 1985 Corporate Ex V Pres and Pres, Grocery and Specialty Products Div.

WAYDO, born 1943 married. 1961-1969 University of Texas. 1966-1968 Beechnut Lifesavers, sales representative. 1969-1975 H. J. Heinz Company, Sales Manager-Western Region. 1975-present Borden Inc, 1975 V Pres-Marketing, Sales Wise Foods Snacks Group; 1978 V Pres-Manager, Wise Foods; 1978 President-Wise Foods, 1981 Group V Pres-Snacks Group, 1984 Senior Group V Pres-Dairy and Snack Group; Jan 1985 Corporate V Pres; Oct 1985 Corporate Ex V Pres and Pres-Snacks and International Consumer Products Div.

D'AMATO, born 1931 married. 1952 Polytechnic Institute of Brooklyn, CE degree. 1959-present Borden Inc; 1982 Group V Pres-Chemical Div; 1985 Corporate Ex V Pres and Pres-Packaging and Industrial Products/Domestic and International.

KELLY, born 1938 married. 1962 Lafayette College, BA degree; 1964 University of Chicago Graduate School of Business, MBA degree. 1957-1959 United States Army.

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HISTORY

(Cont'd) 1964-1969 Citibank N.A. 1969-1972 Hartwell & Campbell. 1972-1974 P/H Management Corporation, Pres. 1974-1980 Gulf Oil Corporation. 1980-present Borden Inc, 1980 V Pres-Treas.

KOCHER, born 1934 married. 1956 Fordham University, BS degree; 1959 University of Michigan, JD degree; 1968 New York University Law School, LL.M degree. 1962-1968 Pfizer Inc, attorney. 1968-1969 Stauffer Chemical Corp. 1969-present Borden Inc; 1969 Divisional Counsel; 1971 Litigation Counsel; 1974 Corporate Counsel; 1977 Asst Gen Counsel; 1979 Corporate V Pres-Gen Counsel.

DOZA, born 1938 married. 1962 University of Missouri, BS degree. 1965 CPA. 1962-1972 Price Waterhouse, manager. 1972-present Borden Inc; 1974 Controller; 1977 V Pres-Controller; Jul 1985 V Pres-Finance-Chief Financial Officer; Oct 1985 Senior V Pres-Chief Financial Officer.

MILLER, born 1932 married. 1953 Dartmouth College, AB degree; 1956 Harvard Law School, LL.B degree. 1956-1960 United States Navy, Lt. 1956-1968 Jones & Laughlin Steel Corp, labor counsel legal department. 1968-present Borden Inc, 1977 V Pres-Employee Relations. Oct 1985 Senior V Pres-Chief Administrative Officer.

HESS, born 1943 married. 1969 Marshall University, BS in accounting. 1969-1972 Price Waterhouse, staff accountant. 1972-present Borden Inc, various positions, 1985 Assistant Controller; 1987 General Controller; Jan 1988 V Pres-General Controller.

TRITSCH, born 1926 married. 1947 Princeton University, AB degree; 1950 University of Virginia, LL.B degree; 1956 New York University, LL.M degree. 1953 admitted New York State Bar. 1953-1959 Heydon Newport Chemical Corp. 1959-1963 Chemical Fund Inc, Sec. 1963-present Borden Inc, 1974 Sec.

ADDITIONAL VICE PRESIDENTS: ALLEN S CUMMIN (Sr VP), science and technology; FRANK L FLORIAN (Sr VP), planning; JOSEPH A MCCAHERY, general auditor; JAMES T MCCRORY, public affairs; and FRANK H VOIGT, employee relations.

OUTSIDE DIRECTORS: COOPER, Chairman and Chief Executive Officer, The Upjohn Company. DWYER, former senior vice president-finance, American Telephone & Telegraph Company. LEMELLE, president, Mercy College. LUCIANO, Chairman and Chief Executive Officer, Schering-Plough Corporation. LYNN, retired Chairman and Chief Executive Officer, F W Woolworth Co. QUITMEYER, former Chairman and Chief Executive Officer, Amstar Corporation. STEWART, vice president, The Edna Mc Connell Clark Foundation. SULLIVAN, former Chairman and Chief Executive Officer, Borden Inc. TASC0, Chairman and Chief Executive Officer, Marsh & McLennan Companies, Inc. VINK, retired Chairman, North American Philips Corporation.

-----AFFILIATES-----

The Company maintains minority interests in several concerns, domestic and foreign. Intercompany relations include occasional advances from the Company settled at management's convenience.

As a general partner, the Company maintains a minority interest (2%) in Borden Chemicals and Plastics Limited Partnership, Geismar, LA. Formed 1987. Manufactures polyvinyl chloride (PVC) resins and basic chemicals. Intercompany relations consist of supporting payments of preference and common cash distributions (limited to \$240 million in the aggregate); certain fiduciary responsibilities, and various other transactions including the sharing of certain general and administrative costs, merchandise transactions, and charges for usage of railcars owned or leased by Borden Inc.

In 1988, the Company reduced its interest in the partnership from 25% to 2% by selling the common units it held in the the entity for proceeds of \$137.7 million.

-----RECORD-----

Public records reflect that on Dec 27 1977, Docket #LR-CR-77-60 in the United States District Court, Eastern District of Arkansas, Borden Inc was fined \$300,000 following a plea of "no contest" to milk price fixing.

In Dec 1965 Borden and 10 other firms were named defendants in United States District Court in Miami, FL charging conspiracy to set wholesale and retail prices of milk products sold in the Miami area. The Company pleaded "nolo contendere" and paid a \$10,000 fine.

In Dec 1967 a New York County Grand Jury indicted Borden and 18 other milk distributors charging restraint of trade in violation of New York State and anti-trust laws and certain violations of the New York Penal Code in connection with the sale of milk in New York, NY. The Company entered a plea of "nolo contendere" and paid a fine of \$10,000.

OPERATION

05/10/90

Directly and through subsidiaries, the Company is engaged as a producer and marketer of dairy, packaged foods, non-food products and chemical specialties. The

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THIS REPORT, FURNISHED PURSUANT TO CONTRACT FOR THE EXCLUSIVE USE OF THE SUBSCRIBER AS ONE FACTOR TO CONSIDER IN CONNECTION WITH CREDIT, INSURANCE, MARKETING OR OTHER BUSINESS DECISIONS, CONTAINS INFORMATION COMPILED FROM SOURCES WHICH DUN & BRADSTREET, INC. DOES NOT CONTROL AND WHOSE INFORMATION, UNLESS OTHERWISE INDICATED IN THE REPORT, HAS NOT BEEN VERIFIED. IN FURNISHING THIS REPORT, DUN & BRADSTREET, INC. IN NO WAY ASSUMES ANY PART OF THE USER'S BUSINESS RISK, DOES NOT GUARANTEE THE ACCURACY, COMPLETENESS, OR TIMELINESS OF THE INFORMATION PROVIDED, AND SHALL NOT BE LIABLE FOR ANY LOSS OR INJURY WHATEVER RESULTING FROM CONTINGENCIES BEYOND ITS CONTROL OR FROM NEGLIGENCE.

9R2-10 (780128)

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OPERATN

(Cont'd) Company segments its operations into four business divisions (1989 percentages): dairy, 28%; grocery and specialty products, 26%; snacks and international consumer products, 23%; and packaging and industrial products - domestic and international.

Principal product segments (1989 percentages - 4.2% divested) are: dairy, 28.4%; niche grocery, 17.6%; films and adhesives, 17.1%; snacks, 15.8%; pasta products, 8.7%; and nonfood consumer products, 8.2%.

Major individual product lines include: packaged pasta; processed fluid milk, milk drinks, chocolate milk, skim milk, cottage cheese, packaged ice cream and ice milk, frozen yogurt desserts, sherberts, and processed cheese; pasta sauce; snacks such as potato chips and sticks, tortilla chips, cheese puffs, and caramel popcorn; non-dairy creamers; reconstituted lemon and lime juice; dehydrated soups; instant coffee; numerous line of other packaged food products; and numerous lines of non-food products such as adhesives, caulks; transparent wrapping film and resins; wallcoverings; and spray paints.

Terms are principally 2% 10 net 11 days and 1% 10 net 30 days and net 30 days. Has 50,000 accounts. Sells to processors, distributors, wholesalers, retail stores, institutions, governmental agencies and industrial users. Territory: Nationwide (78%) and foreign (22%).

Nonseasonal.

EMPLOYEES: 46,500 including officers. 20 employed here.

FACILITIES: Leases 30,020 sq. ft. on 40th floor of multi story office building in good condition. Premises neat.

LOCATION: Headquarters are located in mid-town Manhattan.

BRANCHES: As of Dec 31 1989, the Company operated 120 food manufacturing and processing facilities in the United States and 46 foreign food and dairy manufacturing and processing facilities located principally in Latin America and Western Europe. In addition, the Company operated 36 domestic non-food manufacturing and processing facilities and 60 foreign non-food manufacturing and processing facilities located principally in Brazil, Western Europe, Canada and the Far East.

SUBSIDIARIES: Borden Inc has over 100 subsidiaries, the majority of which are wholly-owned and engaged in functions similar to their parent. Intercompany relations include advances by Borden Inc to certain of its subsidiaries which are periodically retired at the convenience of management and occasionally parent guarantees certain transactions of certain subsidiaries.

08-28(424 /444) 00000
City Bank, 299 Park Ave, New York, NY.

001678678 NH

Assigned to me 10/18/90 EOB - Sally out 10/19/90

10/19/90 Read

1/22/90 Sally took it back to reread -

- 1) Get ~~basic~~ ^{ONE} compliance order from Phy ~~113~~ or Gordon.
- 2) See if Kevin P's unit has done a CO on a permitted facility in Ohio - no one is. Sally's unit has - No, per Sally later
- 3) Order D+B from NEIC for calculation of penalty - ordered from Tina Wilson 10/23 @ 2pm
- 4) Call SOS for registered agent 614/466-3900

Columbus Coated Fabrics Corporation
agent: Prentize-Hall Corporate System
380 S. Fifth St.
Columbus, OH 43215

Jane:

You'll need to pull the
Part B permit file for
this facility, which
contains the finally ^{missing}
issued permit, and
also the compliance
file. Please ask Sean
to help you with this.

Bill Wesley has a list
of Federally issued
permits. Ask him to
look at it and tell
you who the contact
for Columbus Coated
Fabrics is in Lisa Picard's
Ohio Permits section.

Steve Bouchard ^{Thanks -} Sally

10-23-90

Notes from Part A file (blue plastic binder)

- co. produces coated fabrics - not rubberized
- legal owner/operator is Borden, Inc., 80 E. Broad St., Columbus, OH 43215
- TSD facility
drums only?
- CCF Corp. is a division of Borden Chemical Co. according to map in Part B.
- Part B contains financial assurance of Borden, Inc. - uses corporate guarantee for 9 facilities
- Insurance by Northwestern National Insurance Co.

Compliance file -

- Noted for violations in 1987 LDR inspection - later in compliance (mostly for nonrevision of waste analysis plan)
- Noted for violations in 1988 LDR inspection - many similar to now-cited violations

Most of part B missing - called Steve Bouchard in Lisa Pierard's ^{permits} section to locate missing parts of file - he's out till 10/26/90

10-25-90 Bouchard called - showed me files - actual signed permit (original) is missing - permit issued in 1984 but appealed by facility - Bouchard said last record shows no resolution of the appeal

10-26-90

last found files show contamination discovered by ^{underground} tanks in 1986 - possible corrective action - contact Wally Nied

10-26-90

left messages twice for Mike Berman, who is shown assigned to Borden, Inc. RCRA matter on atty. assignment printout. —

left msg. for Deb Garber — former chief of section Anne Alonzo worked for

★ Need to find permit — can't tell what the final requirements were. Do they even have one?

★ Need a history of the facility since issuance of permit in 1984.

- Berman called — recalls nothing — referred me to Rett Nelson, who was in charge of an ORC permits group
- He also says Ann Alonzo is still in the region — left msg. for her — she's out today

- Deb Garber says talk to Rett — she was only Section IV chief in 1990 but does recall Ann Alonzo having a RCRA permit appeal

- Deb says after we respond it goes to the Judicial Officer in D.C. for a decision

- Rett ~~will~~ will check list of permit appeal decisions to see if there was a decision on this. Will check to see if their file room has anything.

- suggests talking to George Hamper — former chief of Ohio permits section

~~Stu~~
- George Hamper — recalls the name but nothing more — connected me to Dan Patel'ski in Lisa Pierard's section to check who was the original permit writer — Chuck Staustas!

- left msg. for Staustas @ 4:45 p.m.

10-29-90

- Chuck called me - I called him - phone tag

He came to see me + said the appeal was filed by the Columbus Health Department and was ultimately resolved by Borden changing some policies.

Slaustas: couldn't recall who the attorney was, but thought it was someone who has since left the agency. Said Ann Alonzo was only assigned later.

Slaustas will look in the Permits Branch "records annex" for anything he might have on this facility.

- Ann Alonzo called back - she doesn't recall the facility name or the circumstances I described about the corrective action debate.

10-30-90

- Rett called - ~~we~~ checked w/ HQ - their records show appeal filed in November 1984 - withdrawn 8-25-85.

- Got land ban file from Ann Budich.

10-31-90

- Left msg. for Slaustas. Sally says talk to Lisa Piemond + then call the state

- Got a call from Rett + talked to him later - He got a call from the record center (24-hr.) + they located 5 boxes. We'll get them next week, and I'll help him review them. Also he recalled @ least one case of a permitted facility being cited for violations - a DOJ referral, though. It was Walt Frances' site - works in Joe Boyle's section.

11-5-90 • Chuck Stautas found the permit +
more of the Part B. Gave it to me.
(Docket file)

• Got copy of compliance order filed in 1986
for Hitco Case from Walt Frances

11-6-90 Reviewed docket file + permit - effective date
is in question due to appeal - left msg. for
Roger Grimes, atty. on appeal

Steve Bouchard could shed no light on it

11-7-90 Grimes called me back - I was out of town.

11-9-90 Left 2 msgs. for Roger (6-6595)

Re-reviewed Compliance File and find no similar
violations since 1982 - prior to issuance of permit

11-13-90 Grimes called - I was out sick.

11-14-90 Grimes out until 11-16-90. I'll call him.

11-15-90 Rett returned my call of 11-14-90 - boxes will
be in next week

11-16-90 Roger out again today - left msg.

11-27-90 Rec'd. copy of NOV + CEI insp. rep. from Kevin's unit

11-28-90 Ann concurred w/ my interpretations of ~~their~~^{DEPT's} memo of
violations. I will talk to them about the results of
their NOV.

Called Laurie Stevenson to ask her to gather
the appropriate people for a discussion tomorrow, if
possible. She said she'd talk to Pam Allen + set it up.

- Spoke to Roger - go with original date permit issued -
It's as if appeal never occurred since the appeal
was withdrawn.

11-29-90 Spoke to Rett - boxes from storage due in tomorrow. He'll call me if received.
He disagrees w/ Roger's view of effective date of permit. Since CCF would have been treated as an interim status facility if they had been found in violation during the pendency of the appeal, we cannot now view them as a permitted facility during that period simply because the appeal was withdrawn rather than adjudicated.

11-30-90 I called Pam Allen - Andy + she can talk to me anytime next week. We set it up for 9 a.m. Dec. 5.

12-3-90 Rett called - boxes arrived. I can see them tomorrow.
12-4-90 Boxes contain only material related to a suit over air emissions from CCF steam boilers - settled in 1984. Ann will ask other chiefs in the branch how we go about checking with other divisions re: ongoing actions in other media.

12-5-90 Conference call w/ Ohio:

Lundy Adelsberger, CDO Group Leader
Andy Kubalok, Inspector
Pam Allen, RCRA enforcement

CCF is on the road to compliance for Ohio's NOV so OEPA will not escalate until at least 120 days. They thought we were doing an NOV.

12-5-90 Ann still wants an order
Gave Joe Boyle overview of violations - he concurs.

12-14-90 Called Rett - he doesn't have specific date appeal was filed - so I call Brenda Seldan (382-4076) to get it - left msg. 2:45

12-18-90 Spoke to Mike Hopkins, OEPA air ^{614/}771-7505, and he says they are in compliance on air emissions. They don't expect any enforcement activity.

12-20-90 Nov. 7, 1988 is when ~~the~~ appeal was filed - I called Brenda again when she didn't call me

Finished putting complaints info on disk in boilerplate; gave disk to Phyllis w/ penalty sheet @ EOB.

12-21-90 Phyllis out

12-27-90 Rec'd. complaint pkg. draft from Phyllis 4:30 p.m.

12-28-90 Reviewed + returned for further corrections 10 a.m.
No action by Phyllis.

12-31-90 I did the corrections and assembled the draft sign-off folder w/ Ann's direction. Turned in to Ann mid-day. She read + returned it w/ changes to compliance deadlines 4:30 p.m. I began to make changes before EOB.

1-1-91 through 1-7-91 I was sick.

1-8-91 I finished making changes + turned it in to Ann again mid-day.

2-8-91 Nick Bolla called from ORC. He's been assigned to it + signed off on it.

2-11-91 Got compliance order folder back + gave it to Phyllis for corrections

2-13-91 Final to Gordon for signature

Spoke to Andy Kubalak - OEPA finally RTCed CCF after 3 letters on CEI violations. Still lots of problems w/ their Part B application.

2-13-91

Spoke to Ed Linville (OEPA's DERR) - said CCF did a voluntary removal of some underground tanks a few years back & found soil around them contaminated w/ MEK & MIVK. But they put the soil back in the holes & covered it up. Simply installed sumps to pump out contam. water from area, which they sent down city sewers. Current readings for contam. are below detection levels. Fire chief did require them to remove the petroleum-contam. soils, which they did. Linville did a PA at the facility early last summer simply because it had been on a list of sites long due for PAs. No findings which will justify remedial action.

3-12-91

Order filed w/ hearing clerk.

3-19-91

Andy Kubalak called. He got a call from CCF's Grover Thomas (environ. coord.) - they received our complaint. He wanted Andy to discuss details of the inspection report & OEPA's memo/letter to us. Asked to set up meeting w/ Andy to have him go over their response. He ^{Andy} was reluctant on all counts & relieved when I said we didn't want any of this happening. Said he's too busy anyway and that Thomas tends to make more of something than you intend. He'll tell Thomas to call me. Thomas said it's company policy to usually not appeal but pay fine & come into compliance.

Andy said they finished review of the revised Part B & still have 109 comments. (They had 125 the first time.) It will go to Savage now, who is expected to write a nasty letter to CCF.

4-10-91

Jim Warchall of Sidley + Austin 853-7692 called - he has been retained by Borden - wanted to know if he really had to file an answer by 30 days (April 15) if they are requesting settlement conference. After consulting Ann I told him he still had to meet the 30-day deadline.

4-11-91

Spoke to Andy Kubalak re: HWDIM's data. Also, he said Grover called again to "chat" - said that ^①only half of the distillation still equipment was actually removed; and ^②Borden wants the Ohio permit but CCF didn't want it and has now requested that corporate HQ let them withdraw the Part B and do a closure - CCF is presently shipping off its waste every two weeks.

4-15-91

Call from Warchall - asking for settlement conference - I left msg. for Bollo.

4-16-91

Finally reached Bollo - he'll set up conference. Left msg. for Kubalak to check on their affirmative defense. He's out until Friday.

4-19-91

Called OEPA - Kubalak not in today.

4-22-91

Called OEPA - Kubalak on jury duty. Spoke to Lundy Adelsburger. Kubalak will be out all week. He'll get a message to Andy to call me. Adelsburger thinks CCF atty. may be confused about what constitutes the permit, thinking the pending Part B Ohio application & its revisions are in force.

4-23-91 Andy Kubalak called. Said the permit ~~is~~ he used was the one in the OEPA files - i.e. the 1984 federal permit. When he came to facility for the start of the multi-day inspection he ~~inform~~ met with Wm. Ilg + Grover Thomas + told them he would be using the original permit. Told them if they have any letters to USEPA notifying of changes or modifications to that permit, they should provide them to Kubalak by the day he was to do the fed. permit portion. Ilg said they were probably in his files, but he didn't ask anyone to retrieve them. Kubalak was never given or shown any such letters and Andy never found any in OEPA files. Ilg wanted Kubalak to use the new Opd Part B application + its modifications. Kubalak explained as best he could that was not their current permit, but CCF personnel seemed confused on this issue. They had trouble locating their own copy of the original permit and ultimately did not.

On affirm. defense #2 Kubalak said he was told at the inspection that the still was removed about a year earlier. Suggested I check with Cliff Merton +/or Lundy Adelsburger about whether it was on site at the time of their previous inspection.

In general Kubalak said he tried to be patient with them (CCF personnel) during the inspection. The review of permit took 3 hours - unusually long, he said. When he asked them questions, they would debate among themselves for a while and give contradictory answers.

4-23-91 Left msg. for Nick Bollo.

4-24-91

Nick is asking his boss to reassign this matter to another attorney due to a trial he faces in 2 weeks which will last 6 weeks.

4-29-91

Left msg. for Larry Ryle to find out who is assigned.

5-7-91

Meeting w/ Jeff Cohn, new attorney assigned. Told him I still may not be part of the permitted facility. This appears to nullify our last (biggest) count.

5-8-91

Left msg. for Andy Kudalak. He called later. Doesn't have further documentation on training or sampling records.

6-3-91

Spoke to Andy re: whether his copy of new Part B submission has in fact of a copy of the original permit. It does. Andy said Gordon withdrew its Part B last week & will be going through closure. They've hired a consultant for that & same looking books.

6-4-91

Spoke to Steve Boudard in our permit section confirmed the fed. permit will be in effect until closure is certified complete & the facility requests & receives revocation of its ^{fed.} permit. Closure could take as little as 2 months. The RFA may already have occurred. Permitting can still pursue corrective action under HSWA even tho they're withdrawing their permit.

6-6-91

Conferring w/ Jeff Cohn before meeting. We can draft a CAFE w/ ~~environmental~~ ^{confidentiality} for the possible termination of their federal permit. Settlement conference. They agreed to \$100 and never mentioned withdrawal of this Part B. CAFE & Amended Complaint to typing.

A problem developed when Jeff notified them that we had to amend the complaint. They withdrew the settlement. Jeff later countered @ \$2900 (after consulting w/ me) and they agreed to it. We changed the CAFO and sent it through sign-off. Uylaine wanted all documents (including the motion) in one package. After we got that together, it continued through sign-off. Sent out 7-30-91 by Jean Sharp.

9-20-91 We have had a proposal for changes from AS counsel, including removal of language referring to civil penalty. We have accepted most changes but not that one. Today I checked w/ Jeff & he has not yet gotten back to AS attys. to tell them that.

10-8-91 I checked w/ Jeff Cahn. He went over the changes w/ AS atty. last week and has not heard from them.

10-10-91 Returned Permit to files.

Sometime early November / late October -

I called Jeff for an update & he said CCF attys. sent CAFO to their client w/ a recommendation that they sign it.

11-21-91 - Rec'd. new emergency coordinator list from CCF - it does not include a permit modification request.

11-22-91 Called Jeff Cahn - he's been talking to Borden's atty., who promised the CAFO this week. Yesterday she said he'd get it today. He'll walk it over to start sign-off when he gets it.

I gave Phyllis transmittal memo for final change. Rec'd. final from her.

12-3-91 Jeff Cahn left me voicemail that he has the AFO

12-5-91 Jeff brought me 1 copy of signed AFO

12-6-91 Gave transmittal letter to clerk typist for preparation - rec'd. final. Assembled folder for final sign-off. Will discuss w/ Phyllis + Uylaine. Monday re: where to place yellow copies in folder. Ready to go!



State of Ohio Environmental Protection Agency

Central District Office

Street Address:

2305 Westbrooke Drive, Building C
Columbus, Ohio 43228
614-771-7505 FAX 614-771-7571

Mailing Address:

P.O. Box 2198
Columbus, Ohio 43266-2198

Richard F. Celeste
Governor

CHIEF
INSP
LEBAN
ISS

September 26, 1990

RE: COLUMBUS COATED FABRICS
FRANKLIN COUNTY
OHD004294351/01-25-0145
G - TSDF

Mr. William G. Ilg
Environmental Coordinator
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43201

Dear Mr. Ilg:

On September 4, 1990 and September 6, 1990 the Ohio EPA, Central District Office inspected Columbus Coated Fabrics to determine compliance with Ohio and U.S. EPA rules pertaining to the generation and storage of hazardous waste. The following violations were discovered during the inspection:

1. Personnel Training: [OAC 3745-65-16(D)(2)(3)]/40 CFR 265.16(d)((2)(3)) - A written job description for each position related to hazardous waste management was not available on September 4, 1990. The facility corrected this violation before the inspection was completed on September 6, 1990.

A written description of the type and amount of both introductory and continuing training related to hazardous waste management was not available on September 4, 1990. The facility corrected this violation before the inspection was completed on September 6, 1990.

2. General Waste Analysis: [OAC 3745-65-13(A)(1)]/40 CFR 265.13(a) - The facility indicated that the current waste analysis plan (revised March 6, 1990) is the one found in their Part B Permit Application dated March 8, 1990.

The waste analysis plan (WAP) contains hazardous waste analysis for the following hazardous waste streams which are no longer generated: engraving wastewater treatment sludge, filter cake waste tre (?), ferric chloride, monoethanamine hydrochloric acid, xylene based dev (?) zinc chloride, oil absorbent material and rags with cyanide. These waste streams should be deleted.

Mr. William G. Ilg
Environmental Coordinator
Columbus Coated Fabrics
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September 26, 1990

The WAP indicates that chromic sludge is E.P. Toxic for chromium and lead and probably corrosive. Analytical results in the WAP do not indicate that the chromic sludge is a D002 hazardous waste. Will this waste stream be classified as a D002 waste?

Following our review of the WAP, it is unclear if analytical data have been provided for the following waste codes on the Part A = F002, F003, F005, P029, P098. Please provide analytical data for these waste streams which are generated at your facility.

The WAP indicates that analysis are found on Pages 4-11 of the plan. The analysis are found on Pages 4-24 of the plan. Correct this discrepancy.

The units for analytical results which have been provided in the WAP, Pages 10 and 11 are illegible. Please provide legible copies.

3. General Waste Analysis: [OAC 3745-65-13(B)(1)(2)(3)(6)]/40 CFR 265.13(b) - The WAP fails to specify the analytical test methods for hazardous waste streams. The specific analytical test method for each parameter must be specified in the WAP.

The WAP fails to include the specific sampling method for each of the waste streams.

The WAP indicates that sampling procedures for dust stop wastes, dust stop oil and electroplating waste are described on Pages 6, 7, 8, 9, 10 and 11. Pages 6, 7 and 8 do not provide these descriptions. The WAP does not contain Pages 9, 10 or 11. Please correct this discrepancy.

The WAP indicates that incompatible wastes are generated. Indicate which hazardous wastes are incompatible. Indicate how this determination was made and include any analytical data used to make this determination.

The rationale for the list of parameters chosen to store the waste in accordance with Ohio regulations shall be described.

Mr. William G. Ilg, Environmental Coordinator
Columbus Coated Fabrics
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Table 1 lists cyclohexanone, methylene chloride and 1,1,1-trichloroethane as parameters to be tested. Waste analysis data shall be provided for these three waste streams.

Table 1 does not include the parameters or the rationale for the limestone sump plating residue or oil absorbent material, for which analysis have been provided.

The WAP indicates that an independent lab will evaluate samples for reactivity. Provide sample results for reactivity.

The right side of the page which includes Table 1 has been cut off. Please submit a new page which is complete.

4. Content of Contingency Plan: [OAC 3745-65-52(A)(B)(C)(D)]/40 CFR 265.52 - The contingency plan references copies of letters sent to emergency service authorities. The contingency plan shall describe the arrangements and/or agreements with these emergency service authorities listed in the contingency plan.

Page 31 lists the emergency coordinators to be called in the event of a fire or a major spill. The lists of alternate emergency coordinators on Pages 30, 32 and 33 are not in the same order as Page 31. None of these lists are in the same order. One concise list for the emergency coordinator and alternates shall be submitted.

The list of emergency equipment fails to include all of the items mentioned in the plan, such as:

Page 13 - bags of clay, scrap cloth

Page 14 - booms

Page 16 - floor dry type of absorbent/absorbent type pillow

Page 19 - squeegees

The plan shall incorporate all emergency equipment at the facility onto one list which includes the location, a physical description of each item and a brief outline of its capabilities.

5. Copies of Contingency Plan: [OAC 3745-65-53(B)]/40 CFR 265.53 - The contingency plan was updated three times in 1989. Copies of letters forwarding the plan to emergency service authorities are all dated December 15, 1988. A copy of the revised contingency plan shall be submitted to all emergency service authorities which are referenced in the plan.

6. Emergency Procedures: [OAC 3745-65-55]/40 CFR 265.55 - Page 33 of the plan indicates the names of employees who have the authority to implement the emergency procedures described in the contingency plan. Clarify why only a few of the alternate emergency coordinators listed on Pages 29, 30, 31 and 32 have the authority to commit resources to the plan.
7. Closure Plan; Amendment of Plan: [OAC 3745-66-12(B)]/40 CFR 265.112 - The plan indicates that soil samples will be analyzed if soil is suspected of being contaminated. The plan shall indicate that soils will be sampled and analyzed on confirm the absence of contaminants. The plan shall include the sampling methods and testing methods for each constituent likely to be present in the soil as a result of facility operations.

The plan shall indicate that if rinse waters indicate the area is not clean, additional washing and rinsing will be conducted followed by additional testing of the rinse waters to verify the area is free of contamination. Rinseate clean levels must meet Ohio EPA, Division of Solid and Hazardous Waste Management clean levels.

The plan shall indicate how disposal of empty containers will be accomplished.

The plan shall include a detailed description of the steps or procedures which will be taken to decontaminate or dispose of equipment, structures, soils, residues or any other clean-up materials associated with closure.

8. Closure Plan; Amendment of Plan: [OAC 3745-66-12(E)]/40 CFR 265.112 - The plan shall allot time for soil sampling, soil analysis, disposal or decontamination of equipment and structures, and testing of wash water and rinse water.

The plan shall indicate that within 60 days of completion of closure, CCF and an independent professional engineer will submit a certification of closure indicating that the closure was conducted in accordance with the approved closure plan.

9. Management of Containers: [OAC 3745-66-73(A)]/40 CFR 265.173 - A 55 gallon container dated August 28, 1990 with a label indicating it contained F003, F005, D001, D008 hazardous wastes was not closed. This violation was corrected during the inspection.

Mr. William G. Ilg, Environmental Coordinator
Columbus Coated Fabrics
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September 26, 1990

Your response shall indicate the measures or procedures you will take to prevent this violation from reoccurring.

10. Inspections: [OAC 3745-66-74]/40 CFR 265.174 - Weekly inspections were not being conducted in the south end of Building Number 95. Approximately nine (55) gallon containers were being accumulated at this location.

Should you decide to continue accumulating containers of hazardous waste at this location; then weekly inspections must be conducted for evidence of leaks or corrosion. These inspections must be documented.

Documentation of correction of the violations cited above must be submitted to our office within thirty days of the date of this letter.

An annual record review of Financial Assurance Requirements, as required by OAC Rules 3745-66-42 through 3745-66-47, is conducted by Carolyn J. Reieron of our Central Office staff.

The RCRA Land Disposal Restriction Inspection Checklists which were completed during the inspection will be forwarded to U.S. EPA, Region V for appropriate follow-up.

Your cooperation and the time you spent meeting with me is appreciated.

Should you have any questions regarding the inspection please give me a call at (614) 771-7505.

Sincerely,



Andrew D. Kubalak
Division of Solid & Hazardous Waste Management
Central District Office

ADK/sc

Enclosures

cc: Carolyn J. Reieron, DSHWM, CO

3LH/14-18

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: Columbus Coated Fabrics
 Address: 1280 North Grant Avenue City: Columbus
 State: Ohio Zip Code: 43201 County: Franklin
 Facility Contact: William Ilg Grover B. Thomas III
 Inspector(s) Name(s): Andrew D. Kubalak
 Date of Inspection: 9/4/90 & 9/6/90
 HWFB #: 01-25-0145 U.S. EPA ID #: OHD004294351 Facility Phone #: (614) 297-6097
 Facility Contact Phone #: (614) 297-6097 Safety Equipment #: _____

STATUS: _____ Cond. Ex. SQG _____ Transporter _____ X Generator _____ Treatment
 _____ SQG _____ Storage _____ Disposal _____

ACTIVITIES: X Containers _____ Land Treatment
 _____ Tanks _____ Landfill
 _____ Surface Impoundments _____ Groundwater Monitoring
 _____ Incineration/Thermal Treatment _____ Used Oil Burner
 _____ Waste Pile _____ Hazardous Waste Fuel Burner/Blender

	Yes	No	N/A	Remark #
1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)?	X			
2. Are they:				
a. Abandoned (disposed; incinerated; accumulated, stored, or treated prior to disposal)?	X			*
b. Recycled?	X			*
c. Inherently waste-like? (F020, F021, F022, F023, F026, F028)?		X		
3. If recycled or accumulated, treated or stored before recycling, is the waste:				
a. Used in a manner constituting disposal?		X		
b. Burned for energy recovery?	X			*
c. Reclaimed? (Refer to Table 1 of 3745-51-02)	X			*
d. Accumulated speculatively?		X		

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. Is the material recycled by being:				
a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?	<u>X</u>	<u> </u>	<u> </u>	<u>*</u>
b. Used as an effective substitute for commercial products?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
c. Returned to the original process from which it was generated without prior reclamation as a substitute or a raw material feedstock?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
5. Are LDR wastes generated? If so, complete appropriate LDR checklist.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
6. Has the facility submitted a Part A to Ohio in accordance with OAC 3745-50-40?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41 thru 43?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
8. If not accurate, has a PCR been submitted in accordance with OAC 3745-50-51? If yes, what date was the PCR submitted?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
10. Has the facility submitted a Part B?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
11. Was advance notice of the inspection given? If so, how far in advance?	<u>X</u>	<u> </u>	<u> </u>	<u>1 Week</u>

REMARKS, GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

* See the description of Waste Handling on Information, Page 2.

Site Activity: Columbus Coated Fabrics (CCF) manufactures wall coverings and vinyl sheeting.

Waste Handling:

F003, F005, D001, D006 and D008 wastes are generated when tubs, drums and pans are cleaned with MEK/MIBK. The liquid solvent waste ink mixture is manifested to Safety-Kleen for fuel blending.

The solids are manifested to Rineco in Arkansas and Petro-Chem in Michigan.

D006 and D008 wastes are generated in the banbury mixer area. This waste is manifested off-site to Chem-met.

REMARKS, GENERAL INFORMATION (CONT.)

Banbury area waste mixture consisting of mixer scrapping, banbury oil residue and floor sweepings has in the past been used as a raw material substitute for plasticizers and fillers for the production of fire wall.

F006 waste generated from the wastewater pre-treatment unit is manifested to Tricil in Hilliard. D007 waste (chrome contaminated rags) generated in this area are manifested off-site to GSX - Cleveland.

D001 waste is generated at the DN-14 process area. This waste is manifested off-site to Petro-Chem, Michigan.

D002 waste generated from cleaning the rollers is manifested off-site to Cyanokem, Michigan.

OAC 3745-52 GENERATOR REQUIREMENTS (40 CFR PART 262)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 - (262.11)?	<u>X</u>			
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 - (261.4)?		<u>X</u>		
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] - 265.1(c)(9) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] - 265.1(c)(10)?	<u>X</u>			*
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist.		<u>X</u>		
- 5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised U.S. EPA Form 8700-22?	<u>X</u>			
b. The manifest form used contains all the information required by 3745-52-20 - (262.20) and the minimum number of copies required by 3745-52-22 - (262.22)?	<u>X</u>			
c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) - (262.20)?	<u>X</u>			
d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1 & 2) - (262.23)?	<u>X</u>			
e. The generator has complied with manifest exception reporting requirements in 3745-52-42 - 262.42(a)?	<u>X</u>			
f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 - (262.40)?	<u>X</u>			
6. Does the generator meet the following hazardous waste pre-transport requirements:	<u>X</u>			
a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] - (262.30, 262.31, 262.32)?	<u>X</u>			

	Yes	No	N/A	Remark #
b. Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32 - (262.32)?	<u>X</u>			
c. Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 - (262.33)?	<u>X</u>			
7. Does the generator import or export hazardous waste?		<u>X</u>		
If so, are the wastes handled in accordance with the requirements of 3745-52-50 - (262.50)?			<u>X</u>	
8. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a hazardous waste facility installation and operation permit as provided under 3745-52-34 - (262.34), are the following requirements with respect to such accumulation met:				
a. The containers or tanks are clearly marked with the words "Hazardous Waste"?	<u>X</u>			
b. The date that accumulation began is clearly marked on each container?	<u>X</u>			
c. If the waste is accumulated in containers, the generator is complying with OAC 3745-66-70 to 3745-66-77? Complete <u>Management of Containers</u> checklist.		<u>X</u>		"See Management of Containers Checklist"
d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90 to 3745-66-99 except OAC 3745-66-97(C)? Complete <u>Storage and Treatment in Tanks</u> checklist.			<u>X</u>	
e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:				
1. Quantities of waste accumulated do not exceed 55 gallons at any time?	<u>X</u>			
2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?			<u>X</u>	

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2 above, has the generator marked the containers with words "Hazardous Waste" or with other words to identify the contents of the container and is the generator complying with OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76, and 3745-66-77?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(C)-262.34(c) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
9. Has the generator accumulated hazardous wastes in excess of ninety (90) days?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
10. Has the generator been granted an extension by the Director/Regional Administrator for accumulation in excess of ninety (90) days?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a U.S. EPA identification number from the Administrator as required under 3745-52-12 - (262.12)?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
12. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) - (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] - (262.34)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
13. Does the generator keep all of the records required by 3745-65-16(D)(E) - (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] - (262.34)	<u> </u>	<u>X</u>	<u> </u>	<u>1.</u>
14. Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
15. Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists.	<u> </u>	<u> </u>	<u>See Applicable Checklists</u>	<u> </u>

REMARKS, GENERATOR REQUIREMENTS

* See the description of site activity found on Information, Page 2.

1. Written job descriptions must be maintained for each position related to hazardous waste management. A written description of the type and amount of both introductory and continuing training related to hazardous waste management must be included in the training plan.

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR PART 265, SUBPART B)

	Yes	No	N/A	Remark #
1. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1)-265.13(a)?		X		2.
2. Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste? [3745-65-13(B)] - 265.13(b)		X		3.
3. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? [3745-65-14(A)(1)] - 265.14(a)(1)		X		
b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] - 265.14(a)(2)	X			
IF BOTH 3.a. AND 3.b. ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.				
4. Does the facility have:				
a. A 24-hour surveillance system, or	X			
b. An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)] - 265.14(b)(2)	X			
5. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)] - 265.14(c)	X			
6. a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years? [3745-65-15] - (265.15)	X			
b. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspected daily when in use and according to other applicable regulations when not in use. [3745-65-15(B)(4)] - 265.15(b)(4)	X			
7. Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? 265.16(a)(b)(c)	X			

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
8. Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? 265.16(d)(e)	<u> </u>	<u> X </u>	<u> </u>	<u>See #1</u>
9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] - (265.17)	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
a. Protection from sources of ignition.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
b. Physical separation of incompatible waste materials.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
d. Commingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) 265.17(b)?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>

REMARKS, GENERAL FACILITY STANDARDS

2. & 3. The facility indicated that both the current chemical and physical analysis and the current waste analysis plan are found in the Ohio Part B Permit application dated March 8, 1990.

Specific deficiencies are cited in the inspection letter under Items 2 and 3.

OAC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265, SUBPART C)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] - (265.31)	<u>X</u>			
2. Has there been a fire, explosion or non-planned release of waste at the facility?		<u>X</u>		
a. If yes, has the contingency plan been implemented?			<u>X</u>	
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] - (265.32)				
a. Internal alarm system?	<u>X</u>			
b. Access to telephone, radio or other device for summoning emergency assistance?	<u>X</u>			
c. Portable fire control equipment?	<u>X</u>			
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	<u>X</u>			
4. Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] - (265.33)	<u>X</u>			
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] - (265.34)	<u>X</u>			
6. If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] - (265.35)	<u>X</u>			
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] - 265.37(a)	<u>X</u>			
8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [3745-65-37(B)] - 265.37(b)			<u>X</u>	

REMARKS, PREPAREDNESS AND PREVENTION

OAC 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265, SUBPART D)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] - (265.52):				
a. Actions to be taken by personnel in the event of an emergency incident?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b. Arrangements or agreements with local or state emergency authorities?	<u> </u>	<u>X</u>	<u> </u>	<u>4.</u>
c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?	<u> </u>	<u>X</u>	<u> </u>	<u>4.</u>
d. A list of all emergency equipment including location, physical description and outline of capabilities?	<u>X</u>	<u> </u>	<u> </u>	<u>4.</u>
e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] - 265.52(f)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] - (265.53)	<u> </u>	<u>X</u>	<u> </u>	<u>5.</u>
3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] - (265.54)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] - (265.56)	<u> </u>	<u>X</u>	<u> </u>	<u>6.</u>
5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J) - 265.56(a-j)?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

REMARKS, CONTINGENCY PLAN AND EMERGENCY PROCEDURES

4., 5. & 6. The facility indicated that the current contingency plan is found in the Ohio Part B Permit application dated March 8, 1990.

Specific deficiencies in the contingency plan are cited as Items 4, 5 and 6 in the inspection letter.

CONTINGENCY PLAN & EMERGENCY PROCEDURES - 1

OAC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) - (265.73) which contains the following information:				
a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] - 265.73(b)(1)	<u>X</u>			
b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?	<u>X</u>			
c. The estimated (or actual) weight, volume or density of the waste material?	<u>X</u>			
d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2)	<u>X</u>			
e. The present physical location of each hazardous waste within the facility and cross-references to specific manifest document numbers?	<u>X</u>			
f. Records of incidents which require implementation of the Contingency Plan?			<u>X</u>	
g. FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] - 265.73(b)(2)			<u>X</u>	
h. Records of any waste analyses and trial tests required to be performed?	<u>X</u>			
i. Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?	<u>X</u>			
j. Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6) - 265.73(b)(6)?			<u>X</u>	
k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?	<u>X</u>			

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
2. Has the o/o submitted an annual (biennial) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under [3745-65-75] - (265.75)?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
<u>NOTE:</u> THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.				
3. Are manifests received by the facility signed and dated?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] - (265.71)	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] - 265.71(b)?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) - 265.72(a) noted in writing on the manifest document.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) - 265.72(b) or has the o/o submitted the required information to the Director/Regional Administrator?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) - (265.76) been submitted to the Director/Regional Administrator within 15 days?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

REMARKS, MANIFESTS/RECORDS/REPORTING

OAC 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] - (265.112)?	<u> </u>	<u> X </u>	<u> </u>	<u> 7., 8. </u>
a. A description of how each hazardous waste management unit will be closed in accordance with 265.111.	<u> </u>	<u> X </u>	<u> </u>	<u> 7., 8. </u>
b. A description of how final closure will meet the requirements of 3745-66-11 - (265.111).	<u> </u>	<u> X </u>	<u> </u>	<u> 7., 8. </u>
c. An estimate of the maximum amount of hazardous waste in inventory.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
d. A description of steps taken to remove or decontaminate facility equipment, containment systems, structures, soils, and all hazardous waste residues.	<u> </u>	<u> X </u>	<u> </u>	<u> 7. </u>
e. The year closure is expected to begin and a schedule for the various phases of closure.	<u> </u>	<u> X </u>	<u> </u>	<u> 8. </u>
f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] - 265.112(C)	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] - 265.112(d)	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
4. Has the closure plan (and post-closure plan, if applicable) for tank, container storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] - 265.112(d)	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] - 265.113(a)	<u> </u>	<u> </u>	<u> X </u>	<u> </u>

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] - 265.113(b)	_____	_____	<u>X</u>	_____
7. Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] - (265.115)	_____	_____	<u>X</u>	_____
8. Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plat in accordance with OAC 3745-66-16?	_____	_____	<u>X</u>	_____
9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?	_____	_____	<u>X</u>	_____
10. If closure was partial, list the regulated units which remain in use at the facility: <u>N/A</u>	_____	_____		_____
11. If required, has the facility prepared a written post-closure plan? [3745-66-18] - (265.118)	_____	_____	<u>X</u>	_____
12. Does the post-closure plan include:				
a. A description of proposed ground water monitoring?	_____	_____	<u>X</u>	_____
b. A description of planned maintenance activities?	_____	_____	<u>X</u>	_____
c. The name, address and phone number of person/office to contact during the post-closure period?	_____	_____	<u>X</u>	_____
13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] - (265.119)	_____	_____	<u>X</u>	_____
14. Has the owner of the property on which a disposal unit is located recorded on the deed that:				
a. The land has been used to manage hazardous waste and the type, quantity and location of waste?	_____	_____	<u>X</u>	_____
b. Land use is restricted under closure and post-closure rules? [3745-66-19]	_____	_____	<u>X</u>	_____

REMARKS, CLOSURE AND POST-CLOSURE

7. & 8. The facility indicated that the current closure plan is found in the Ohio Part B Permit application dated March 8, 1990.

Specific deficiencies in the closure plan are cited in Items 7 and 8 in the inspection letter.

OAC 3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART 1)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Are hazardous wastes stored in containers which are:				
a. Closed [3745-66-73(A)] - (265.173)?		<u>X</u>		<u>9.</u>
b. In good condition [3745-66-71] - (265.171)?	<u>X</u>			
c. Compatible with the wastes stored in them [3745-66-72] - (265.172)?	<u>X</u>			
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] - 265.173(a)		<u>X</u>		<u>9.</u>
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] - 265.173(b)	<u>X</u>			
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] - (265.174) [documentation of inspections required under 3745-65-15 for TSDs]		<u>X</u>		<u>10.</u>
5. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] - (265.176)	<u>X</u>			
6. Are containers holding hazardous wastes stored separate from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] - 265.177(c)	<u>X</u>			

REMARKS, CONTAINERS

9. The 55 gallon container dated August 28, 1990, being accumulated adjacent to Building 95, was not closed.
10. The 55 gallon containers (approximately 9) adjacent to Building 95, were not inspected weekly for evidence of leaks and corrosion.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

FACILITY: Columbus Coated Fabrics

U.S. EPA ID No.: OHD004294351 Street: 1280 North Grant Avenue

City: Columbus State: Ohio Zip Code: 43201 Telephone: (614) 297-6097

OPERATOR: Columbus Coated Fabrics

Street: 1280 North Grant Avenue

City: Columbus State: Ohio Zip Code: 43201 Telephone: (614) 297-6043

OWNER: Borden Inc., Division of Borden Chemical

Street: 180 East Broad Street

City: Columbus State: Ohio Zip Code: 43215 Telephone: (614) 225-4000

Inspection Date: Sept. 4, 1990 & Sept. 6, 1990 Time: 9:00 AM Weather Conditions: 80°

INSPECTORS

<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
<u>Andrew D. Kubalak</u>	<u>Ohio EPA</u>	<u>(614) 771-7505</u>

FACILITY REPRESENTATIVES

<u>Name</u>	<u>Title</u>	<u>Telephone</u>
<u>William Ilg</u>	<u>Environmental Coordinator</u>	<u>(614) 297-6097</u>
<u>Grove B. Thomas III</u>	<u>Environmental Supervisor</u>	<u>(614) 297-6097</u>

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F-Solvent	<u>X</u>			<u>X</u>	
Dioxin					
California List					
First Third	<u>X</u>			<u>X</u>	
Second Third					

INSPECTION SUMMARY

Processes That Generate LDR Wastes

Columbus Coated Fabrics (CCF) manufactures wall coverings and vinyl sheeting. F003 and F005 wastes are generated when tubs, drums and pans are cleaned with MEK/MIBK. F006 waste is generated at the wastewater pretreatment unit. F009 waste was generated when the facility ceased using the plating tank and disposed of the tank and its contents as F009 waste.

LDR Waste Management

- F003 and F005 - the liquid solvent waste ink mixture is manifested to Safety-Kleen for fuel blending. The solids are manifested to Rineco in Arkansas and Petro-Chem in Michigan.
- F006 waste is manifested to Tricil in Hilliard.
- F009 waste was manifested off-site to Cyanokem.

Summary

The facility appears to be in compliance with the Land Disposal Restriction Requirements.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
1. Does the facility handle the following wastes?				
a. F001 through F005 spent solvents	<u>X</u>			
List* <u>F001, F003, F005</u>				
b. Dioxin-containing Wastes		<u>X</u>		
List* _____				
c. California List Wastes		<u>X</u>		
List* _____				
d. First and Second Third Wastes	<u>X</u>			
List* <u>F006, F009</u>				
* List wastes if room allows or attach Appendix A.				
<u>NOTE:</u> Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).				
2. Does the facility handle the following wastes (national capacity variances)?				
a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date - 11/08/90).		<u>X</u>		
Comments _____				
b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date - 11/08/90).		<u>X</u>		
Comments _____				
c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date - 11/08/90).		<u>X</u>		
Comments _____				

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).	_____	<u>X</u>	_____	_____
Comments _____				
e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).	_____	<u>X</u>	_____	_____
Comments _____				
f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).	_____	<u>X</u>	_____	_____
Comments _____				

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

Yes No N/A Remark

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

X _____

If yes, check the appropriate treatability group.

_____ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight

X All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

X _____

If yes, list the waste code and check the correct treatability group.

<u>Waste Code</u>	<u>Wastewater*</u>	<u>Non-wastewater</u>
<u>F006</u>	_____	<u>X</u>
<u>F009</u>	_____	<u>X</u>
_____	_____	_____
_____	_____	_____

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

_____ X _____

If yes, specify the method: _____

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
------------	-----------	------------	---------------

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

		<u>X</u>	
--	--	----------	--

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

		<u>X</u>	
--	--	----------	--

4. Does the generator mix restricted wastes with different treatment standards?

	<u>X</u>		
--	----------	--	--

Comments _____

If yes, did the generator select the most stringent treatment standards [268.41(b), 268.43(b)]?

		<u>X</u>	
--	--	----------	--

Comments _____

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste

<u>X</u>			
----------	--	--	--

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

All hazardous waste streams.

Was all supporting data retained on-site,
[268.7(a)(5)]?

Yes

No

N/A

Rem.

X

- TCLP

X

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

All known hazardous waste streams sampled and being analyzed for TC on August 8, 1990, August 9, 1990 and August 13, 1990

- Total constituent analysis

X

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach these results.

- pH \leq 2

X

List the wastes for which pH testing was used.

All waste streams

- Paint Filter Liquid Test

X

List the wastes for which PFLT was used.

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

X

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

X

Facility indicated that they do not accumulate wastes > 60 days.

If yes, the TSD Checklist must be completed.

Yes No N/A Remark

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

X _____ _____ _____

(If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

<u>Waste Code</u>	<u>Facilities</u>	<u>Treat/Store</u>
<u>F009</u>	<u>Cyanoken, Detroit, MI</u>	<u>X</u>
<u>F006</u>	<u>GSX, Cleveland, O</u>	<u>X</u>
<u>F003, F005</u>	<u>Petro Chem</u>	<u>X</u>

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

X _____ _____ _____

- Does notification contain the following:

EPA hazardous waste number(s)

X _____ _____ _____

Applicable treatment standards and prohibition levels

X _____ _____ _____

Manifest number

X _____ _____ _____

Waste analysis data, if available

Only Initially _____ _____ _____

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

_____ X _____ _____

(If no, go to c)

If yes, identify waste code and off-site disposal facilities:

<u>Waste Code</u>	<u>Facility</u>
_____	_____
_____	_____
_____	_____

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Rema</u>
- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?	_____	_____	_____	_____
- Does notification contain the following?				
EPA hazardous waste number(s)	_____	_____	_____	_____
Applicable treatment standards and prohibition levels	_____	_____	_____	_____
Manifest number	_____	_____	_____	_____
Waste analysis data, if available	_____	_____	_____	_____
Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	_____	_____	_____	_____
c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).	_____	<u>X</u>	_____	_____
(If no, go to d)				
- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?	_____	_____	_____	_____
- Does the notification contain the following information?				
EPA hazardous waste number(s)	_____	_____	_____	_____
The corresponding treatment standards and all applicable prohibitions	_____	_____	_____	_____
Manifest number	_____	_____	_____	_____
Waste analysis data, if available	_____	_____	_____	_____
Date the waste is subject to the prohibitions	_____	_____	_____	_____
d. Does the facility generate any First or Second Third "soft hammer" waste?	_____	<u>X</u>	_____	_____
(If no, go to 4)				

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?				
(i) EPA hazardous waste number				
(ii) Applicable prohibition [268.33(f), 268.34(h)]				
(iii) Manifest number				
(iv) Waste analysis data, if available				
3. "Soft Hammer" Demonstrations/Certifications				
a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?				
b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?				
c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?				
- If yes, did the generator submit the documentation and certification prior to first shipment?				
d. Does the demonstration contain the following information?				
A list of facilities and facility officials contacted?				
Addresses				
Telephone numbers				
Contact dates				
Certification statement				
Attach a copy of the demonstration and certification.				

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Rem</u> |
|---|------------|-----------|------------|------------|
| e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]? | _____ | _____ | _____ | _____ |

If yes, attach a copy of written discussion.

- | | | | | |
|--|-------|-------|-------|-------|
| f. Does the generator ship its "soft hammer" waste off-site for treatment? | _____ | _____ | _____ | _____ |
|--|-------|-------|-------|-------|

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

- | | | | | |
|---|-------|-------|-------|-------|
| g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste? | _____ | _____ | _____ | _____ |
|---|-------|-------|-------|-------|

- | | | | | |
|--|-------|-------|-------|-------|
| h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities? | _____ | _____ | _____ | _____ |
|--|-------|-------|-------|-------|

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

<u>X</u>	_____	_____	_____
----------	-------	-------	-------

Comments _____

D. RCRA Corrective Action and CERCLA Response Action Waste

- | | | | | |
|--|-------|----------|-------|-------|
| 1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment? | _____ | <u>X</u> | _____ | _____ |
|--|-------|----------|-------|-------|

Comments _____

- | | | | | |
|---|-------|-------|----------|-------|
| 2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)? | _____ | _____ | <u>X</u> | _____ |
|---|-------|-------|----------|-------|

Comments _____

1. Treatment Using RCRA 264/265 Exempt Units or Processes

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark</u> |
|--|------------|-----------|------------|---------------|
| 1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)? | _____ | <u>X</u> | _____ | _____ |

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

_____	_____	<u>X</u>	_____
-------	-------	----------	-------

Comments _____

If yes, the residuals are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

_____	_____	<u>X</u>	_____
-------	-------	----------	-------

Comments _____

If yes, the TSD checklist must be completed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD

TSD CHECKLIST

TSD REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
A. <u>General Facility Standards</u>				
1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?				
F-solvent (TCLP)*	<u>X</u>			*
Dioxin (TCLP)			<u>X</u>	
California List (PFLT and/or total constituent analysis)*			<u>X</u>	
First & Second Third (TCLP and/or total constituent analysis)	<u>X</u>			*
* TCLP = Toxicity Characteristic Leaching Procedure (268, App. I)				
PFLT = Paint Filter Liquids Test (SW-846)				
2. Does the facility obtain representative chemical and physical analyses of wastes and residues?		<u>X</u>		
It is unclear if analyses are available				
Comments	<u>for F003 and F005 wastes.</u>			
a. What date was the waste analysis plan last revised?				
	<u>March 6, 1990</u>			
b. Are analyses conducted on-site or off-site?				
	<u>On-site</u>	<u>X</u>	<u>Off-site</u>	
Identify off-site lab:	<u>R.C.P., Inc.</u>			
	<u>Columbus, Ohio</u>			
	<u>Stilson Labs,</u>			
	<u>Columbus, Ohio</u>			
c. Are F-solvent and dioxin containing waste analyzed using TCLP?	<u>X</u>			*
* Waste streams have been sampled and are currently being analyzed for TC.				

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).	_____	_____	<u>X</u>	_____
e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.	<u>X</u>	_____	_____	_____
* BDAT = best demonstrated available technology				
3. Are the operating records, including analyses and quantities, complete [264/265.73]?	<u>X</u>	_____	_____	_____
4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.	<u>X</u>	_____	_____	_____

Comments _____

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

_____ X _____

(If no, go to C, Treatment)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

_____ Tanks _____ Containers

_____ Other [Identify inappropriate storage unit(s)].

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remai</u>
------------	-----------	------------	--------------

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

_____	_____	_____	_____
-------	-------	-------	-------

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

_____	_____	_____	_____
-------	-------	-------	-------

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

_____	_____	_____	_____
-------	-------	-------	-------

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

_____	_____	_____	_____
-------	-------	-------	-------

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

_____	_____	_____	_____
-------	-------	-------	-------

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

_____	_____	_____	_____
-------	-------	-------	-------

If yes, state how: _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

a. In a facility meeting the TSCA criteria in 761.65(b)?

_____	_____	_____	_____
-------	-------	-------	-------

b. More than one year [268.50(f)]?

_____	_____	_____	_____
-------	-------	-------	-------

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

_____	<u>X</u>	_____	_____
-------	----------	-------	-------

(If no, go to D, Surface Impoundments)

2. Describe the waste codes and treatment processes:

Waste Code

Treatment Processes

_____	_____
-------	-------

_____	_____
-------	-------

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
3. Was dilution used as a substitute for treatment [268.3]?	_____	_____	_____	_____
Comments _____				
4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?	_____	_____	_____	_____
Comments _____				
Have treatment standards or prohibition levels been met?	_____	_____	_____	_____
Comments _____				
5. Does the facility ship any waste or treatment residue to an off-site disposal facility?	_____	_____	_____	_____
If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]?	_____	_____	_____	_____
(If yes, the Generator portion of the checklist must be completed).				
6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?	_____	_____	_____	_____
7. Does the facility treat "soft hammer" wastes?	_____	_____	_____	_____
(If no, go to 8.)				
a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?	_____	_____	_____	_____
b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?	_____	_____	_____	_____
8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?	_____	_____	_____	_____

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remarks</u>
------------	-----------	------------	----------------

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

_____	_____	_____	_____
-------	-------	-------	-------

Identify waste codes and off-site facilities:

<u>Waste Code</u>	<u>Facility</u>
_____	_____
_____	_____
_____	_____

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

_____	_____	_____	_____
-------	-------	-------	-------

D. Surface Impoundments

1. Are prohibited wastes placed in surface impoundments for treatment?

_____	<u>X</u>	_____	_____
-------	----------	-------	-------

List _____

(If no, go to E. Land Disposal)

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?

_____	_____	_____	_____
-------	-------	-------	-------

3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and groundwater monitoring requirements?

_____	_____	_____	_____
-------	-------	-------	-------

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____	_____	_____	_____
-------	-------	-------	-------

5. Have the Subpart F groundwater monitoring requirements been met?

_____	_____	_____	_____
-------	-------	-------	-------

6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____	_____	_____	_____
-------	-------	-------	-------

Attach test results.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?				
Sludge Waste Code _____	_____	_____	_____	_____
Supernatant Waste Code _____	_____	_____	_____	_____
8. Provide the frequency of analyses conducted on treatment residues:				

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?	_____	_____	_____	_____
10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?	_____	_____	_____	_____
Comments _____	_____	_____	_____	_____
a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?	_____	_____	_____	_____
b. Are residues subsequently managed in another surface impoundment?	_____	_____	_____	_____
c. Are residues treated prior to disposal?	_____	_____	_____	_____
Comments _____	_____	_____	_____	_____
If yes, are waste residues treated on-site or off-site?				
_____ On-site _____ Off-site				
Identify waste code and treatment method:				
<u>Waste Code</u>	<u>Treatment Method</u>			
_____	_____			
_____	_____			
_____	_____			

Yes No N/A Rema.

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

Comments _____

E. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

_____ X _____

NOTE: Do not include surface impoundments addressed in D, Surface Impoundments.

If yes, specify which units and what wastes each unit has received:

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

If yes, at what frequency? _____

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?	_____	_____	_____	_____
Comments _____				
If yes, have the minimum technology requirements been met for all units receiving such wastes?	_____	_____	_____	_____
6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?	_____	_____	_____	_____
7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?	_____	_____	_____	_____
8. Are restricted wastes placed in underground injection wells?	_____	_____	_____	_____
List* _____				



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020 Fax (614) 644-2329

Richard F. Celeste
Governor

RECEIVED
OCT 2 - 1990

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

September 25, 1990

RE: COLUMBUS COATED FABRICS
OHD004294351/01-25-0145

Ms. Sally Swanson, Chief
Indiana/Ohio/Minnesota Enforcement Programs Section
RCRA Enforcement Branch
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Ms. Swanson:

Attached is a summary of the Federal RCRA Permit conditions that were not being met at the time of Ohio EPA's September 7, 1990, inspection of the Columbus Coated Fabrics facility. It is anticipated that U.S. EPA still intends to issue the Notice of Violation to the company for its failure to comply with these conditions, because they are not specific violations of Ohio's hazardous waste laws or regulations. Please advise if this is not your understanding.

If I can be of any assistance, do not hesitate to call me at (614)644-2934.

Sincerely,

Laurie Stevenson, Supervisor
Inspections and Information Management Unit
RCRA Enforcement Section
Division of Solid and Hazardous Waste Management

2003S/3

LAS/ljp

cc: Lundy Adelsberger, CDO Group Leader
Mike Savage, Assistant Chief, DSHWM
Pam Allen, Supervisor, RCRA Enforcement Section



State of Ohio Environmental Protection Agency

Central District Office

Street Address:

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Columbus, Ohio 43228
614-771-7505 FAX 614-771-7571

Mailing Address:

P.O. Box 2198
Columbus, Ohio 43266-2198

Richard F. Celeste
Governor

M E M O R A N D U M

TO: Kevin Pierard, RCRA Enforcement, U.S. EPA, Region V thru
Pamela Allen, DSHWM, Ohio EPA

FROM: ADK Andrew D. Kubalak thru Lundy Adelsberger, DSHWM, CDO

SUBJECT: Columbus Coated Fabrics Part B Inspection
OHD004294351/01-25-0145

RECEIVED
OHIO EPA

DATE: September 14, 1990

SEP 14 1990

----- DIV. of SOLID & HAZ. WASTE MGT.

On Friday September 7, 1990 we conducted an inspection at Columbus Coated Fabrics to determine compliance with the conditions of their final Resource Conservation and Recovery Act Permit which was issued by U.S. EPA on September 27, 1984. This inspection was conducted in the presence of William G. Ilg, Senior Project Engineer, Environmental Coordinator and Grover B. Thomas, III, Environmental Manager.

The comments listed below represent the permit conditions which were not being met at the time of the inspection, and also indicate the changes in the facility operations which were not provided to Region V after the permit was issued.

The attachments referred to in our comments below are the attachments to the Permit.

Attachment I - Permit Conditions

1. 9. (c)(i)(ii)(iii)(iv)(v)(vi) Monitoring and Records

This condition requires the facility maintain records of waste stream sampling. Facility records did not include the date, exact place and time of sampling, the individual who sampled, the date analyses were performed, the individuals who performed the analyses, the analytical methods used and the results of analyses for the F003, F005 and F006 waste streams.

2. II General Facility Conditions. c. General Waste Analysis

This condition requires the facility follow the procedures described in Attachment II, the waste analysis plan.

SEPTEMBER 14, 1990

The Columbus Coated Fabrics Hazardous Waste Management Table of Organization on Page 92 of Attachment IV (Figure 9) is outdated. The names of the employees filling the Director of Project Engineering, Transportation Coordinator, Production of Waste Coordinator, Lab Analysis of New Material and Existing Wastes for Hazard Determination Coordinator and the Training Director positions are incorrect.

7. II General Facility Conditions. Figure 10

Hazardous waste training records do not indicate that training was received every six months.

8. II General Facility Conditions. Page 100aa (viii)

The facility does not provide training for employees in the solvent still area because the solvent distillation equipment has been removed from the facility. The training plan has not been updated to indicate that training is not required because the distillation equipment has been removed from the facility.

9. II General Facility Conditions. (xii) Implementation of Training Program

This condition requires employees to meet twice per year for review and update of the training program. Semi-annual training. Records were not available indicating training had been received twice per year.

10. II General Facility Conditions. H. Preparedness and Prevention.5. Arrangements with Local Authorities

This permit condition requires the facility describe arrangements entered into with State and local authorities. This permit condition has not been met. Arrangements or agreements have not been described in the contingency plan.

11. II General Facility Conditions Attachment V, Section 3(C)

This section refers to the Plating Building (Area 30). The plating tanks, including cyanide, are no longer used by the facility and have been disposed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Columbus Coated Fabrics (CCF)
 U.S. EPA ID No.: OHD004294351 Street: 1280 North Grant Avenue
 City: Columbus State: Ohio Zip Code: 43201 Telephone: (614) 297-6043
 Operator: Columbus Coated Fabrics
 Street: 1280 North Grant Avenue
 City: Columbus State: Ohio Zip Code: 43201 Telephone: (614) 297-6043
 Owner: Borden Inc., Division of Borden Chemical
 Street: 180 East Broad Street
 City: Columbus State: Ohio Zip Code: 43215 Telephone: (614) 225-4000
 Inspection Date: August 14, 1989 Time: 9:00 AM Weather Conditions: Clear

INSPECTORS

Name	Affiliation	Telephone
<u>Clifford Morton</u>	<u>Ohio EPA</u>	<u>(614) 771-7505</u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

FACILITY REPRESENTATIVES

Name	Title	Telephone
<u>William G. Ilg, P.E.</u>	<u>Environmental Coordinator</u>	<u>(614) 297-6043</u>
<u>Grover Thomas</u>	<u>Process Engineering Supervisor</u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	<u>X</u>	<u>X</u>	<u> </u>	<u>X</u>
Transporter	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Treater	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Storer	<u>X</u>	<u>X</u>	<u> </u>	<u>X</u>
Disposer	<u> </u>	<u> </u>	<u> </u>	<u> </u>

INSPECTION SUMMARY

Site Activity: CCF manufactures various grades and types of vinyl sheeting. CCF also produces various printed patterns of wall tex (wall coverings). CCF operates a electroplating operation that applies chrome to copper cyclinders that are used to transfer print ink onto the wall coverings.

Waste Handling Practices: As a result of manufacturing processes, various types of hazardous waste(s) are generated. Waste inks are identified as F005, D001, D006, D008 or F005, D001, D005, D006 depending upon the various ink constituents and the fact the pans, tubs/drums are rinsed with a MEK, MiBK solvent blend. The waste ink is transported off-site by Safety-Kleen.

The solids are manifested to Rineco in Arkansas. The banbury mixer area generates a waste stream identified as a D006. It is called dust stop oil. This waste is manifested off-site to Chem-met or Michigan Disposal. A waste stream identified as the banbury area waste mixture which consists of mixer scrappings, banbury oil residue and floor sweepings has in the past been used as a raw material substituent for plasticizers and fillers for the production of fire wall. CCF also indicated that a pilot program is underway to find a market for this material. CCF is currently disposing of the banbury area waste mixture as D006 and D008.

The electroplating operation generates a F006 waste from the wastewater pre-treatment unit. Chrome contaminated rags are also generated in this area. This waste stream is manifested off-site as a D007.

The DN-14 process generates a solid waste that is flammable. This waste stream is identified as a waste urithane and is manifested off-site to Rineco as a D001 hazardous waste.

There is another pre-treatment unit in the viking engraving building. The filter cake is manifested off-site as a hazardous waste.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

A. F-Solvent Wastes

Gen. Treat Store Disp. Trans.

1. F001

2. F002

3. F003

4. F004

5. F005

X _____ X _____

NOTE: Use Appendix A to determine whether the facility
is misclassifying any of its wastes.B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified:

N/A

Arsenic 500 mg/L

Cadmium 100 mg/L

Chromium VI 500 mg/L

Lead 500 mg/L

Mercury 20 mg/L

Nickel 134 mg/L

Selenium 100 mg/L

Thallium 130 mg/L

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

N/A

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

N/A

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to: 50 ppm
500 ppm

N/A

Yes	No	N/A	Remark
-----	----	-----	--------

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

	X		
--	---	--	--

If yes, state reasons for mixing:

Gen.	Treat	Store	Disp.	Trans.
------	-------	-------	-------	--------

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

		N/A		
--	--	-----	--	--

NOTE (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

NOTE (2): The effective date of regulation for liquid wastes for HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006°	<u>X</u>	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
F007	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
F008	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
F009	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
F019	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K001°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K004°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K008°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K011	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K013	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K014	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K015°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K016°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K017	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K018°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K019°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K020°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K021°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K022°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K024°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K025°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K030°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K031	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K035	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K036°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K037°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K044°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K045°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
K046°	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047°	_____	_____	_____	_____	_____
K048°	_____	_____	_____	_____	_____
K049°	_____	_____	_____	_____	_____
K050°	_____	_____	_____	_____	_____
K051°	_____	_____	_____	_____	_____
K052°	_____	_____	_____	_____	_____
K060°	_____	_____	_____	_____	_____
K061°	_____	_____	_____	_____	_____
K062°	_____	_____	_____	_____	_____
K069°	_____	_____	_____	_____	_____
K071°	_____	_____	_____	_____	_____
K073°	_____	_____	_____	_____	_____
K083°	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086°	_____	_____	_____	_____	_____
K087°	_____	_____	_____	_____	_____
K099°	_____	_____	_____	_____	_____
K100°	_____	_____	_____	_____	_____
K101°	_____	_____	_____	_____	_____
K102°	_____	_____	_____	_____	_____
K103°	_____	_____	_____	_____	_____
K104°	_____	_____	_____	_____	_____
K106°	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____	_____	_____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P058	_____	_____	_____	_____	_____
P059	_____	_____	_____	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

Yes No N/A Remark

A. BDAT Treatability - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

X

If yes, check the appropriate treatability group.

_____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)

_____ Pharmaceutical wastewater containing spent methylene chloride

 X All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

N/A

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less than 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

Yes	No	N/A	Remark
-----	----	-----	--------

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

X			
---	--	--	--

If yes, check the appropriate treatability group.

_____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)

X Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
F006		F006

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

X			
---	--	--	--

How was this determination made?

- 1) Knowledge of waste

X			
---	--	--	--

If yes, is any supporting data available for review? Describe how this is adequate.

Through waste analysis of the waste ink.

or 11) TCLP

		X	
--	--	---	--

If yes, provide the date of last test, the frequency for testing, and note any problems. Attach test results.

Yes	No	N/A	Remark
-----	----	-----	--------

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

X			
---	--	--	--

If yes, specify the waste stream:

F005 - waste solvent ink & pan wash residue

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

	X		
--	---	--	--

- d. How does the generator test F-solvent waste when a process or waste stream changes?

Laboratory analysis would be used to determine if a waste stream would change.

2. California List Wastes

N/A

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

--	--	--	--

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

--	--	--	--

What type of absorbent is used?

Check the types of waste to which absorbent is added.

_____ Liquid hazardous waste having a pH less than or equal to 2

_____ Liquid hazardous waste containing metals

_____ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

Yes	No	N/A	Remark
-----	----	-----	--------

1) Knowledge of wastes

		X	
--	--	---	--

If yes, is any supporting data available for review?
Describe how this is adequate.

or ii) Testing

		X	
--	--	---	--

If yes, list test method used:

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

		X	
--	--	---	--

If yes, list test method used and constituent and concentration levels that exceeded prohibition levels:

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

		X	
--	--	---	--

3. First Third Wastes:

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

X			
---	--	--	--

NOTE: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

X			Soft Hammer
---	--	--	-------------

If yes, specify the waste stream:

The F006 waste stream exceeds treatment standards.

This is determined through lab analysis of the wastewater treatment sludge.

Yes	No	N/A	Remark
-----	----	-----	--------

How was this determination made?

i) Knowledge of waste

X			
---	--	--	--

If yes, is any supporting data available for review?
Describe how this is adequate.

Lab analysis of the electroplating waste stream (F006).

CCF transports F006 to Tricil for treatment.

ii) TCLP

		X	
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iii) Total Constituent Analysis

		X	
--	--	---	--

Provide the date of last test, the frequency of testing,
and note any problems. Attach test results.

c. Does the generator dilute the waste as a substitute for
adequate treatment [268.3]?

	X		
--	---	--	--

d. How does the generator test the waste when a process or
waste stream changes?

Through lab analysis of the F006 waste stream. However,
the waste stream remains constant.

C. Management

1. On-Site Management

Is restricted waste or waste that exceeds the treatment
standards treated, stored, or disposed on-site?

X			* stored
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If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the
treatment standards to an off-site treatment or
storage facility?

X			* F005 to Safety-Kleen F006-to Tricil
---	--	--	--

	Yes	No	N/A	Remark
b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c. Does notification contain the following?				
EPA Hazardous waste number(s)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
Applicable treatment standards	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
Manifest number	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
Waste analysis data, if available	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

Identify off-site treatment or storage facilities:

Tricil, Safety-Kleen

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
f. Does notification contain the following?				
EPA Hazardous waste number(s)	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
Applicable treatment standards	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
Manifest number	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
Waste analysis data, if available	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
Certification that the waste meets the treatment standards	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Identify off-site land disposal facilities:

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Yes	No	N/A	Remark
-----	----	-----	--------

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number

_____	_____	X	_____
-------	-------	---	-------

The corresponding treatment standards and all applicable prohibitions

_____	_____	X	_____
-------	-------	---	-------

Manifest number

_____	_____	X	_____
-------	-------	---	-------

Waste analysis data, if available

_____	_____	X	_____
-------	-------	---	-------

Date the waste is subject to the prohibitions

_____	_____	X	_____
-------	-------	---	-------

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

_____	X	* No notice on file for F006 waste stream	
-------	---	---	--

D. Demonstration and Certification - "Soft Hammer" Wastes

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.(a)(1)]?

_____	_____	X	_____
-------	-------	---	-------

- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?

_____	_____	X	_____
-------	-------	---	-------

Addresses

_____	_____	X	_____
-------	-------	---	-------

Telephone Numbers

_____	_____	X	_____
-------	-------	---	-------

Contact Dates

_____	_____	X	_____
-------	-------	---	-------

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

_____	_____	X	_____
-------	-------	---	-------

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

_____	_____	X	_____
-------	-------	---	-------

Yes	No	N/A	Remark
-----	----	-----	--------

Describe the type of treatment and treatment facilities.

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

		X	
--	--	---	--

f. Does the generator provide certification with each subsequent shipment of wastes?

		X	
--	--	---	--

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

		X	
--	--	---	--

(i) EPA Hazardous waste number

		X	
--	--	---	--

(ii) Manifest number

		X	
--	--	---	--

(iii) Waste analysis data, if available

		X	
--	--	---	--

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

		X	
--	--	---	--

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

	X		
--	---	--	--

If yes, list types of waste treatment units and processes:

- Limestone sump pit in the electroplating building that is used to treat wastewater prior to being discharged to the sanitary sewer.

- Pre-treatment unit in the viking engraving building.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

Yes No N/A Remark

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

- ☐ F-solvent
- ☐ California List
- ☐ First Third

<u>X</u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u>X</u>	<u> </u>
<u>X</u>	<u> </u>	<u> </u>	<u> </u>

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

<u>X</u>	<u> </u>	<u> </u>	<u> </u>
----------	---------------	---------------	---------------

a. What date was the waste analysis plan last revised?

August 25, 1988

b. Are analyses conducted on-site or off-site?

 On-site X Off-site

Identify off-site lab:

RCP and Stilson Labs

* Done for F005
waste stream for
total metals

c. Is F-solvent waste analyzed using TCLP?

<u>X</u>	<u> </u>	<u> </u>	<u> </u>
----------	---------------	---------------	---------------

d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

<u>X</u>	<u> </u>	<u> </u>	<u> </u>
----------	---------------	---------------	---------------

NOTE: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

e. Describe the frequency of sampling:

Once yearly the F006 waste stream is analyzed

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

<u>X</u>	<u> </u>	<u> </u>	<u> </u>
----------	---------------	---------------	---------------

Yes	No	N/A	Remark
-----	----	-----	--------

F Storage (268.50)

1. Are restricted wastes stored on-site?

<u>X</u>			
----------	--	--	--

If no, go to C, Treatment

2. If yes, check the appropriate method.

 Tanks X Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

<u>X</u>			
----------	--	--	--

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

<u>X</u>			
----------	--	--	--

5. Do operating records agree with container labeling?

<u>X</u>			
----------	--	--	--

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

			* F006 notice copies not found in facilities file
	<u>X</u>		

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

	<u>X</u>		
--	----------	--	--

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

		<u>X</u>	
--	--	----------	--

If yes, state how:

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

		<u>X</u>	
--	--	----------	--

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

		<u>X</u>	
--	--	----------	--

Yes	No	N/A	Remark
-----	----	-----	--------

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

		X	
--	--	---	--

C. Treatment

N/A

1. Does the facility treat restricted wastes other than in surface impoundments?

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standard [268.7(b)]?

4. Is dilution used as a substitute for treatment?

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

If yes, does the treatment facility provide notification and certification to the disposal facility?

Yes	No	N/A	Remark
-----	----	-----	--------

If yes, does notification contain the following?

EPA Hazardous waste number(s)

Applicable treatment standards

Manifest number

Waste analysis data, if available

Certification that the waste meets the treatment standards

Identify off-site disposal facilities:

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

D. Treatment in Surface Impoundments

N/A

1. Are restricted wastes placed in surface impoundments for treatment?

If no, go to E, Land Disposal

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

Yes	No	N/A	Remark
-----	----	-----	--------

6. Provide the frequency of analyses conducted on treatment residues:

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge
Supernatant

- a. If yes, are sludge and supernatant removed adequately on an annual basis?
- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?
- c. Are residues subsequently managed in another surface impoundment?
- d. Are residues treated prior to disposal?

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method:

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

NOTE: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

Yes	No	N/A	Remark
-----	----	-----	--------

If yes, specify which units and what wastes each unit has received:

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and ground water monitoring?

_____	_____	_____	_____
-------	-------	-------	-------

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a)(b)]?

_____	_____	_____	_____
-------	-------	-------	-------

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____	_____	_____	_____
-------	-------	-------	-------

If yes, at what frequency?

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____	_____	_____	_____
-------	-------	-------	-------

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____	_____	_____	_____
-------	-------	-------	-------

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____	_____	_____	_____
-------	-------	-------	-------

8. What is the volume of the restricted wastes disposed of to date?

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____	_____	_____	_____
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APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

	<u>Yes</u>	<u>No</u>
1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?		
tetrachloroethylene	_____	_____
trichloroethylene	_____	_____
methylene chloride	_____	_____
1,1,1-trichloroethane	_____	_____
carbon tetrachloride	_____	_____
chlorinated fluorocarbons	_____	_____
2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?		
tetrachloroethylene	_____	_____
trichloroethylene	_____	_____
methylene chloride	_____	_____
1,1,1-trichloroethane	_____	_____
chlorobenzene	_____	_____
trichlorofluoromethane	_____	_____
1,1,2-trichloro-1,2,2-trifluoroethane	_____	_____
ortho-dichlorobenzene	_____	_____
3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?		
xylene	_____	_____
acetone	_____	_____
ethyl acetate	_____	_____
ethyl benzene	_____	_____
ethyl ether	_____	_____
methyl isobutyl ketone	_____	_____
n-butyl alcohol	_____	_____
cyclohexanone	_____	_____
methanol	_____	_____
If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?	_____	_____
4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?		
cresols and cresylic acid	_____	_____
nitrobenzene	_____	_____

Yes No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

	X
X	
	X
	X
	X

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

- (a) Are the constituents used as chemical carriers?

X

If yes, list the constituents.

MEK - to solubilize the ink

- (b) Are the constituents used for degreasing/cleaning?

X

If yes, list the constituents.

MEK - used to clean the "tubs" and cyclinders

- (c) Are the constituents used as diluents?

X

If yes, list the constituents.

MEK

MiBK

- (d) Are the constituents used as extractants?

X

If yes, list the constituents.

Yes No

(e) Are the constituents used for fabric scouring?

X

If yes, list the constituents.

(f) Are the constituents used as reaction and synthesis media?

X

If yes, list the constituents.

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.) X
8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride	MEK - 93%
2%	trichloroethylene	MIBK - 70%
25%	1,1,1-trichloroethane	
68%	mineral spirits	
100%		

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
51%	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
<u>38%</u>	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.